

## EXHIBIT A



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(12) **United States Patent**  
**Cannon et al.**

(10) **Patent No.:** US 9,642,454 B2  
(b4) **Date of Patent:** May 9, 2017

(54) **MULTIPLE VIEWING ANGLE MEDIA SUPPORT**(71) Applicants: **Bruce Cannon**, Portland, OR (US); **Juliette Fassett**, Portland, OR (US)(72) Inventors: **Bruce Cannon**, Portland, OR (US); **Juliette Fassett**, Portland, OR (US)

(\*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days.

(21) Appl. No.: 15/192,737

(22) Filed: Jun. 24, 2016

(65) **Prior Publication Data**

US 2016/0302568 A1 Oct. 20, 2016

**Related U.S. Application Data**

(63) Continuation-in-part of application No. 14/518,443, filed on Oct. 20, 2014, now abandoned.

(60) Provisional application No. 61/896,540, filed on Oct. 28, 2013.

(51) **Int. Cl.**A47B 97/04 (2006.01)  
A47B 23/04 (2006.01)(52) **U.S. Cl.**

CPC ..... A47B 23/042 (2013.01)

(58) **Field of Classification Search**CPC .... A47B 23/042; A47B 23/043; F16M 13/00;  
F16M 13/022

USPC ..... 40/124.15

See application file for complete search history.

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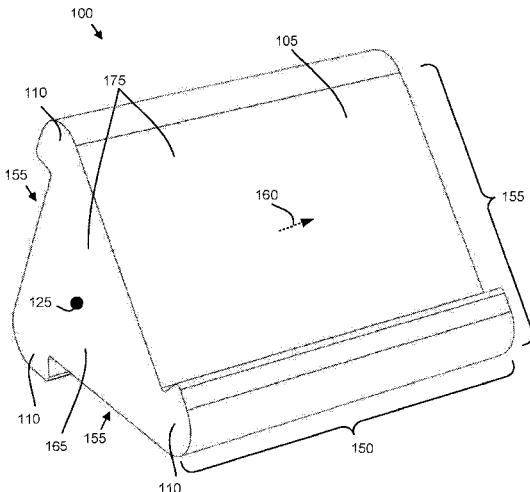
Primary Examiner — Shin Kim

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**ABSTRACT**

For multiple viewing angle media support, and apparatus includes three support sides. Each support side includes a back support and an edge support. A top of each back support is in physical communication with an adjacent edge support clockwise about a central axis and each back support and each edge support is in physical communication with two ends of a solid interior. Each back support, each edge support, and each end is a surface of the solid interior, the solid interior is a pillow covered in fabric, a first viewing angle of the first back support is 36 degrees, a second viewing angle of the second back support is 74 degrees, and a third viewing angle of the third back support is 49 degrees.

**10 Claims, 4 Drawing Sheets**

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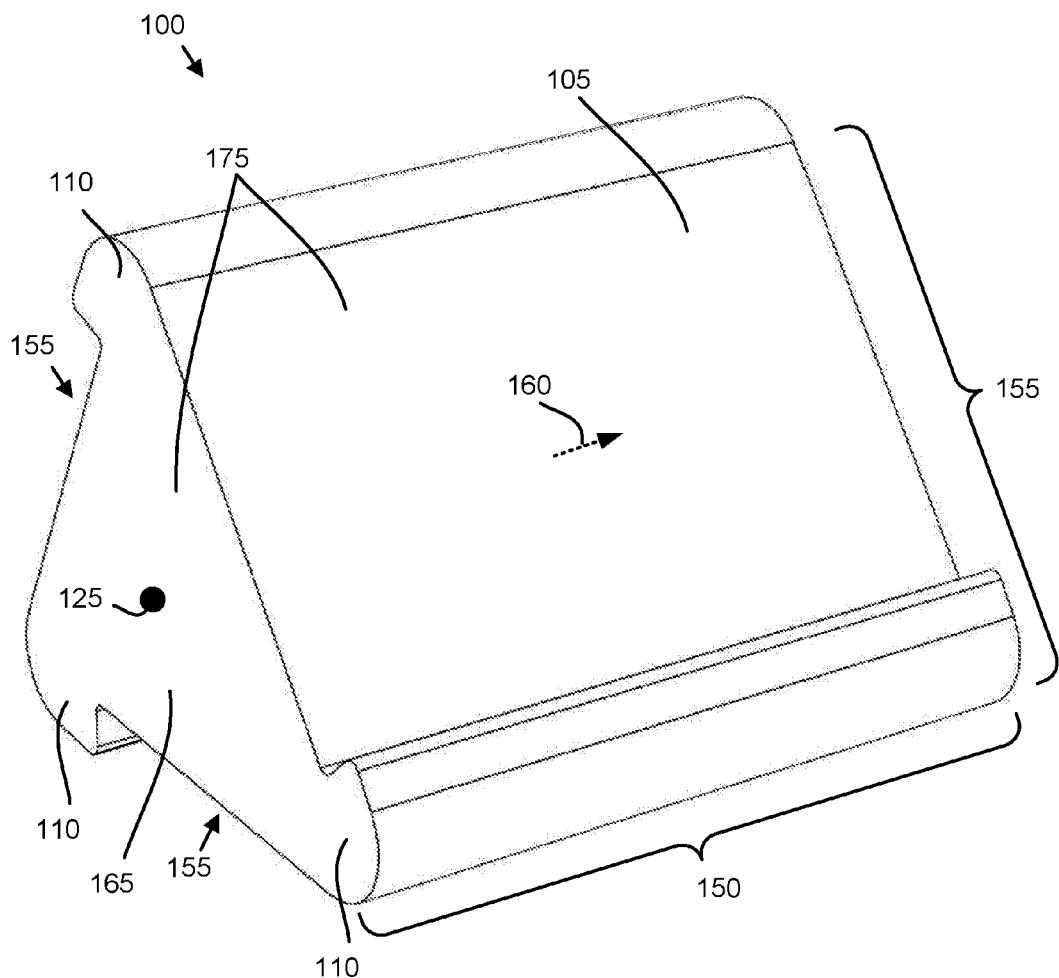


FIG. 1

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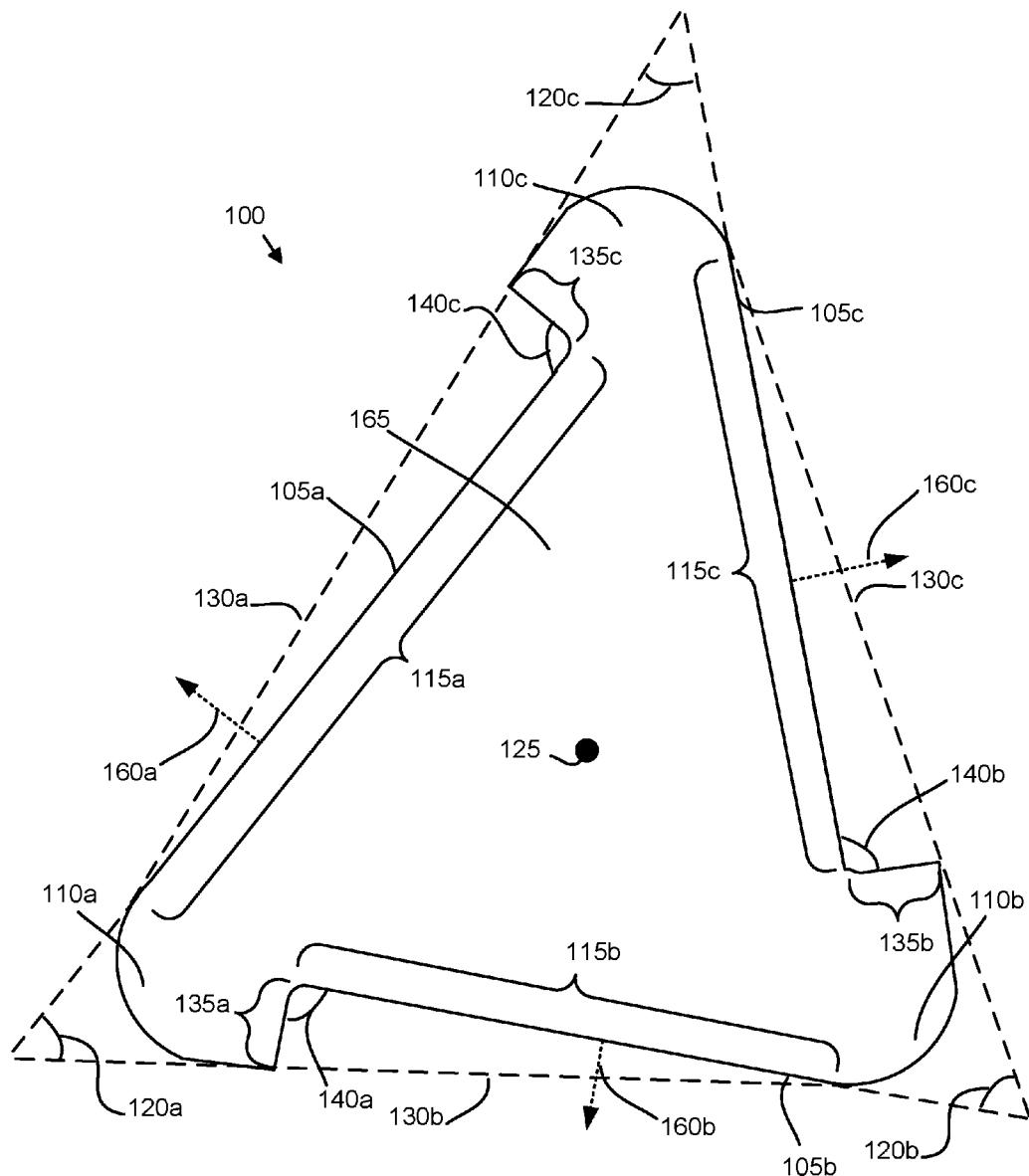


FIG. 2

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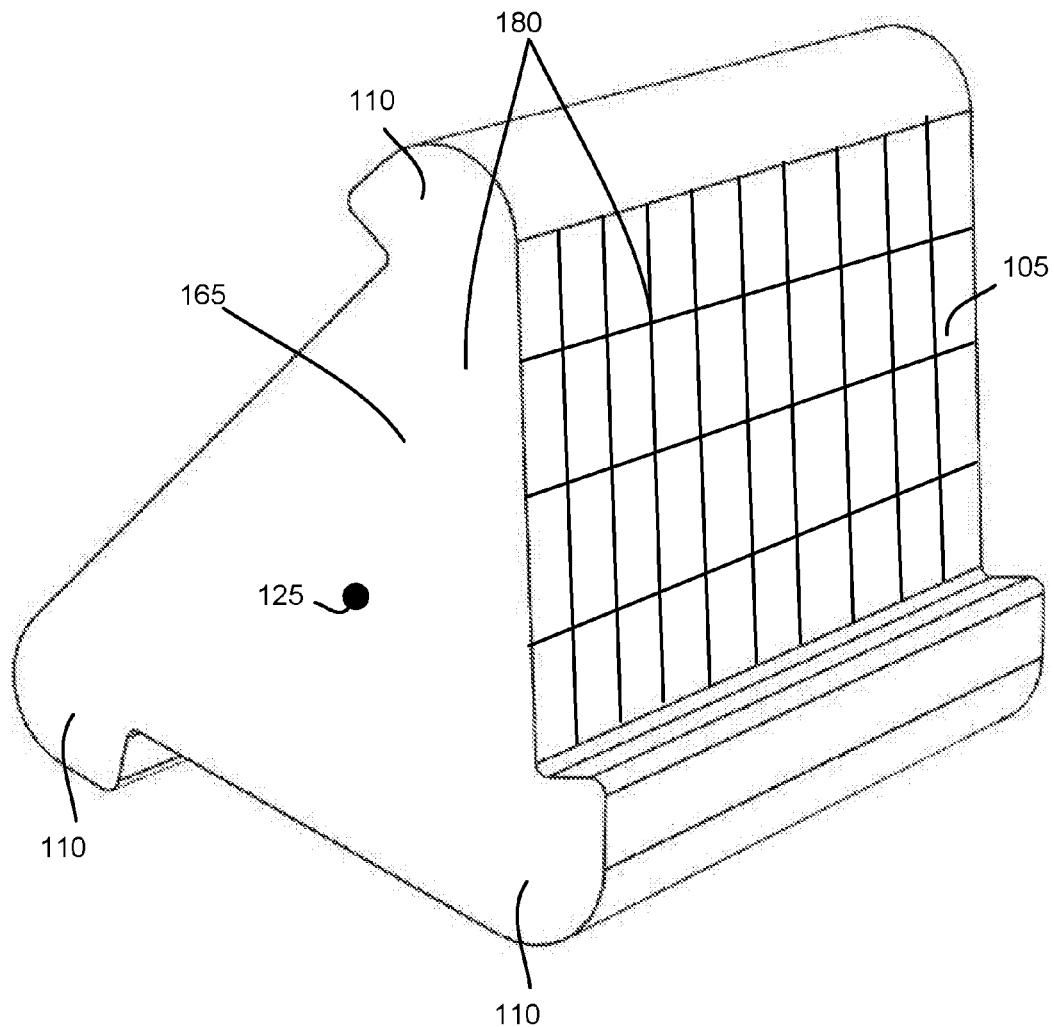


FIG. 3

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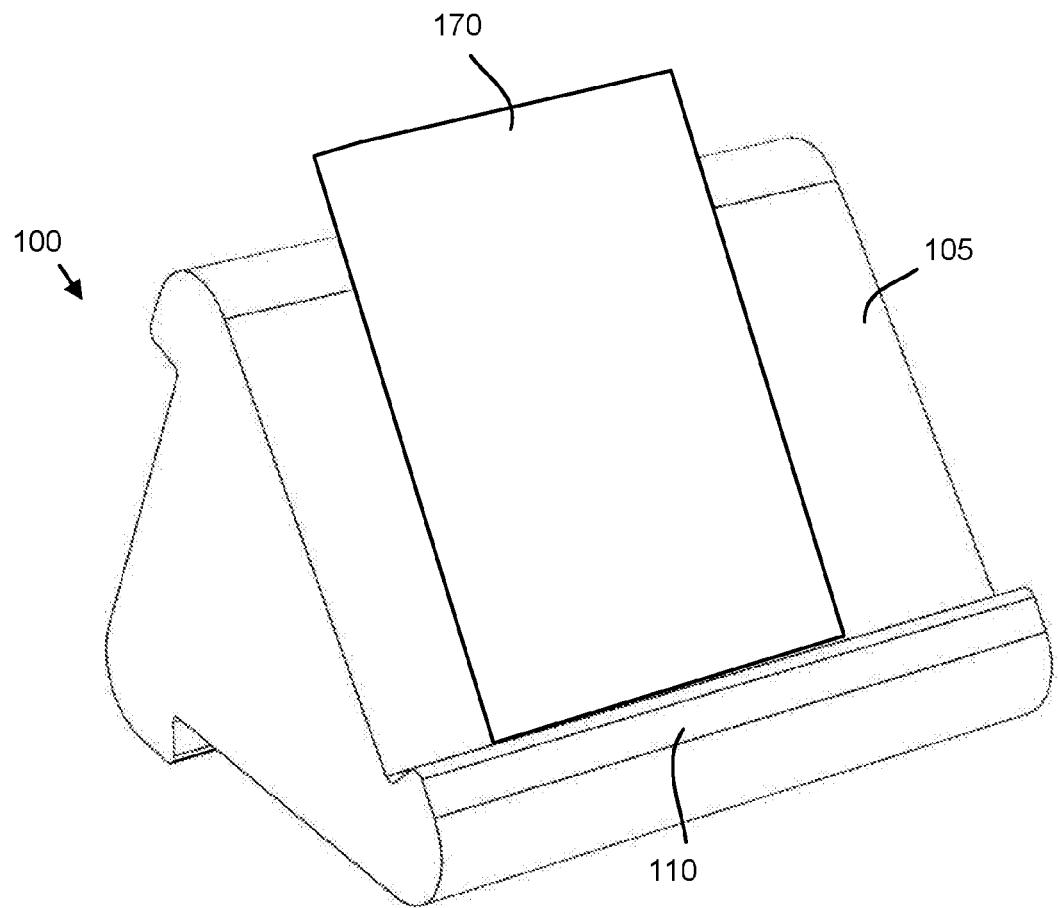


FIG. 4

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MULTIPLE VIEWING ANGLE MEDIA SUPPORT

CROSS-REFERENCE TO RELATED APPLICATIONS

This is a continuation-in-part of and claims priority to U.S. patent application Ser. No. 14/518,443 entitled "MULTIPLE VIEWING ANGLE MEDIA SUPPORT" and filed on Oct. 20, 2014 for Bruce Cannon, which is incorporated herein by reference. U.S. patent application Ser. No. 14/518,443 claims priority to U.S. Provisional Patent Application No. 61/896,540 entitled "FLIPY READER PILLOW" and filed on Oct. 28, 2013 for Bruce Cannon, which is incorporated herein by reference.

FIELD

The subject matter disclosed herein relates to media support and more particularly relates to multiple viewing angle media support.

BACKGROUND

Description of the Related Art

It is often comfortable to support media such as electronic readers, tablet computers, magazines, and books while viewing the media.

BRIEF DESCRIPTION OF THE DRAWINGS

A more particular description of the embodiments briefly described above will be rendered by reference to specific embodiments that are illustrated in the appended drawings. Understanding that these drawings depict only some embodiments and are not therefore to be considered to be limiting of scope, the embodiments will be described and explained with additional specificity and detail through the use of the accompanying drawings, in which:

FIG. 1 is a perspective drawing illustrating one embodiment of a media support;

FIG. 2 is a side view drawing illustrating one embodiment of a media support;

FIG. 3 is a perspective drawing illustrating one alternate embodiment of a media support; and

FIG. 4 is a perspective drawing illustrating one embodiment of media disposed on a media support.

DETAILED DESCRIPTION

Reference throughout this specification to "one embodiment," "an embodiment," or similar language means that a particular feature, structure, or characteristic described in connection with the embodiment is included in at least one embodiment. Thus, appearances of the phrases "in one embodiment," "in an embodiment," and similar language throughout this specification may, but do not necessarily, all refer to the same embodiment, but mean "one or more but not all embodiments" unless expressly specified otherwise. The terms "including," "comprising," "having," and variations thereof mean "including but not limited to" unless expressly specified otherwise. An enumerated listing of items does not imply that any or all of the items are mutually exclusive and/or mutually inclusive, unless expressly specified otherwise. The terms "a," "an," and "the" also refer to "one or more" unless expressly specified otherwise.

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Furthermore, the described features, advantages, and characteristics of the embodiments may be combined in any suitable manner. One skilled in the relevant art will recognize that the embodiments may be practiced without one or more of the specific features or advantages of a particular embodiment. In other instances, additional features and advantages may be recognized in certain embodiments that may not be present in all embodiments.

The description of elements in each figure may refer to 10 elements of proceeding figures. Like numbers refer to like elements in all figures, including alternate embodiments of like elements.

FIG. 1 is a perspective drawing illustrating one embodiment of a media support 100. The media support 100 may 15 position media at one of three varied and carefully chosen angles for viewing by a user. The media may be handheld media. In addition, the media may be an electronic reader, a tablet computer, a video display, a magazine, a book, or the like. Because the media may be handheld, it is often viewed 20 while the user is sitting at a table with the media on the table, while the user is sitting with the media disposed in the user's lap, or while the user is lying down.

During extended periods of viewing, it may be comfortable 25 for the user to prop up the media to reduce hand and arm fatigue. Unfortunately, the use of traditional pillows may position the media at a less than advantageous angle. In addition, during extended viewing periods, the user may shift position, resulting in a need for a support with a different viewing angle. For example, a user may shift from 30 reading while sitting on a couch to reading while lying on the couch.

The embodiments described herein provide support for 35 multiple viewing angles. The angles are carefully chosen to support the media on a table for a sitting user, in the lap of a sitting user, and on a lying user. As a result, the media support 100 provides a comfortable support at an appropriate angle for the most common viewing positions.

In the depicted embodiment, the media support 100 includes 40 three support sides 155. Each support side 155 comprises a support back 105 and a support edge 110. The support sides 155 may be disposed about a central axis 125. The media support 100 may have a latitudinal length 150. The latitudinal length 150 may be in the range of 6 to 50 centimeters (cm). In a certain embodiment, the latitudinal 45 length 150 is in the range of 9 to 25 cm. In one embodiment, the latitudinal length 150 is 15 cm.

In one embodiment, the latitudinal length 150 of an edge support 110 may be different from the latitudinal length 150 of the corresponding side support 155. The edge support 50 latitudinal length 150 may be in the range of 2 to 10 cm. In a certain embodiment, the edge support latitudinal length 150 is in the range of 6 to 8 cm. In one embodiment, the edge support latitudinal length 150 is 7 cm.

The side supports 155 may be arranged to provide three 55 different viewing angles 160 for three different user positions. Each viewing angle 160 is orthogonal to a support back 105. The arrangement of the side supports 155 are disclosed in greater detail in FIG. 2.

In one embodiment, each back support 105 and each edge support 110 is a surface 175 of a solid. The solid media support 100 may have one or more ends 165. Each back support 105 and each edge support 110 may be in physical communication with two ends 165 of a solid interior.

The solid media support 100 may be a pillow. The solid 60 interior may be foam. The foam may have an Indentation Force Deflection (IFD) of in the range of 15-30 kilograms at 25% indentation. In one embodiment, the surface 175 of the

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solid may be a fabric. Each back support 105, each edge support 110, and each end 165 may a surface 175 of the solid interior. The surface 175 of the solid interior may be a pillow is covered in fabric. In one embodiment, the fabric is ultra-suede.

A user may place the media support 100 on a table, in the user's lap, or on the user while lying down. The semi-rigid pillow feel of the media support 100 comfortably contacts the user while providing firm support for the media. The user may further rotate the media support 100 to select a back support 105 with a comfortable viewing angle 160. The user may place media on the edge support 110. The edge support 110 holds the media with the back of the media against the back support 105. As a result, the media may be viewed at the viewing angle 160.

FIG. 2 is a side view drawing illustrating one embodiment of a media support 100. The support backs 105 and the support edges 110 of the three support sides 155 are shown about an end 165. A top of each back support 105 is in physical communication with an adjacent edge support 110 about the central axis 125. A plane of a first back support 105a may be at a first plane angle 120a in a range of 50 to 60 degrees to a second virtual plane 130b between the top of a second back support 105b counterclockwise to the first back support 105a and an outer edge of a second edge support 110b counterclockwise to the first back support 105a. In addition, a plane of the second back support 105b may be at a second plane angle 120b in a range of 55 to 65 degrees to a third virtual plane 130c between the top of a third back support 105c counterclockwise to the second back support 105b and an outer edge of a third edge support 110c counterclockwise to the second back support 110b. A plane of a third back support 105c may be at a third plane angle 120c in a range of 50 to 75 degrees to a first virtual plane 130a between the top of the first back support 105a counterclockwise to the third back support 105c and an outer edge of the first edge support 110a counterclockwise to the third back support 105c.

In one embodiment, the first back support 105a has a longitudinal length 115a in the range of 12 to 26 cm, the second back support 105b has a longitudinal length 115b in the range of 9 to 21 cm, and the third back support 105c has a longitudinal length 115c in the range of 10 to 22 cm. In a certain embodiment, the first longitudinal length 115a is 19 cm, the first plane angle 120a is 60 degrees, the second longitudinal length 115b is 15 cm, the second plane angle 120b is 68 degrees, the third longitudinal length 115c is 17 cm, and the third plane angle 120c is 52 degrees.

The arrangement of the longitudinal lengths 115 and the plane angles 120 generate three distinct viewing angles 160. In one embodiment, the first viewing angle 120a may be 36 degrees, the second viewing angle 120b may be 74 degrees, and the third viewing angle 120C may be 49 degrees.

In one embodiment, each edge support 110 forms an edge angle 140 with an adjacent back support 105. The edge angle 140 may be in the range of 85 to 120 degrees. The edge angle 140 may be 90 degrees. Each edge support 110 may have an edge support width 135. The edge support width 135 may be in the range of 1 to 5 cm. In a certain embodiment, the edge support width 135 is 2 cm.

FIG. 3 is a perspective drawing illustrating one alternate embodiment of a media support 100. In the depicted embodiment, each back support 105 and each edge support 110 is a surface 180 of a frame. Each end 165 may also be a surface 180 of a frame. The frame may include a molded mashed, a fabric mesh, a wire mesh, or the like. In the

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depicted embodiment, the media support 100 includes ends 165. Alternatively, there may be no ends 165 on the media support 100.

FIG. 4 is a perspective drawing illustrating one embodiment of media 170 disposed on the media support 100. A bottom edge of the media 170 is disposed in the edge support 110 while the back of the media 170 is disposed against a back support 105.

The embodiments arrange three support sides 155 to generate three distinct viewing angles 160. Each viewing angle 160 is chosen for a specific viewing orientation. The first viewing angle 160a may be employed when the media support 100 and the media is disposed in the user's lap. The second viewing angle 160b may be used when the media support 100 and the media is disposed on a table and the user is sitting upright. In addition, the 3rd viewing angle 160c may be used when the user is lying down and the media support 100 is disposed on the user.

When the user changes position, the media support 100 may be quickly rotated to provide a different viewing angle 160. As a result, the media support 100 is quickly deployed to provide the appropriate viewing angle 160. In addition, the comfort of the user is greatly enhanced as the media may be viewed at the appropriate viewing angle 160 without the user holding the media.

The media support 100 has been marketed as the "Flipy Tablet Pillow" since 2013 at a retail price of \$49.98. Because of the media support's unique properties, it has enjoyed significant commercial success, with 800 units sold in 2013, 2,233 units in 2014, 925 units in 2015 and 997 units year-to-date in 2016.

Embodiments may be practiced in other specific forms. The described embodiments are to be considered in all respects only as illustrative and not restrictive. The scope of the invention is, therefore, indicated by the appended claims rather than by the foregoing description. All changes which come within the meaning and range of equivalency of the claims are to be embraced within their scope.

What is claimed is:

1. An apparatus comprising:  
three support sides, each support side comprising a back support and an edge support, wherein a top of each back support is in physical communication with an adjacent edge support clockwise about a central axis and each back support and each edge support is in physical communication with two ends of a solid interior, each edge support comprises an edge support width of 2 centimeters (cm) with an edge angle of 90 degrees to an adjacent back support, a face of each edge support width oriented clockwise about the central axis, a plane of a first back support is at a first plane angle of 60 degrees to a second virtual plane between the top of a second back support counterclockwise to the first back support and an outer edge of a second edge support counterclockwise to the first back support, a plane of the second back support is at a second plane angle of 80 degrees to a third virtual plane between the top of a third back support counterclockwise to the second back support and an outer edge of a third edge support counterclockwise to the second back support, a plane of a third back support is at a third plane angle of 40 degrees to a first virtual plane between the top of the first back support counterclockwise to the third back support and an outer edge of the first edge support counterclockwise to the third back support, and wherein each back support, each edge support, and each end is a surface of the solid interior, the solid

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interior is a pillow covered in fabric, a first viewing angle of the first back support is 36 degrees, a second viewing angle of the second back support is 74 degrees, and a third viewing angle of the third back support is 49 degrees.

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2. The apparatus of claim 1, wherein the first back support has a longitudinal length in the range of 12 to 26 centimeters (cm), the second back support has a longitudinal length in the range of 9 to 21 cm, and the third back support has a longitudinal length in the range of 10 to 22 cm.

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3. The apparatus of claim 2, wherein the first longitudinal length is 19 cm, the first plane angle is 60 degrees, the second longitudinal length is 15 cm, the second plane angle is 68 degrees, the third longitudinal length is 17 cm, and the third plane angle is 52 degrees.

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4. The apparatus of claim 1, wherein each back support has a latitudinal length in the range of 9 to 25 cm.

5. The apparatus of claim 4, wherein each back support has a latitudinal length of 15 cm.

6. The apparatus of claim 1, wherein each edge support has a latitudinal length in the range of 2 to 10 cm.

7. The apparatus of claim 6, wherein each edge support has a latitudinal length of 7 cm.

8. The apparatus of claim 1, wherein each edge support has an edge support width in the range of 1 to 5 centimeters (cm).

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9. The apparatus of claim 1, wherein a plane of each edge support forms an edge angle in the range of 85 to 120 degrees with an adjacent back support.

10. The apparatus of claim 9, wherein the edge angle is 90 degrees.

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## EXHIBIT B

(19) **United States**  
 (12) **Reissued Patent**  
 Cannon et al.

(10) **Patent Number:** US RE48,479 E  
 (45) **Date of Reissued Patent:** Mar. 23, 2021

(54) **MULTIPLE VIEWING ANGLE MEDIA SUPPORT**

(71) Applicant: **Happy Products, Inc.**, Portland, OR (US)

(72) Inventors: **Bruce Cannon**, Portland, OR (US); **Juliette Fassett**, Portland, OR (US)

(73) Assignee: **Happy Products, Inc.**, Portland, OR (US)

(21) Appl. No.: **16/262,797**

(22) Filed: **Jan. 30, 2019**

**Related U.S. Patent Documents**

Reissue of:

(64) Patent No.: **9,642,454**  
 Issued: **May 9, 2017**  
 Appl. No.: **15/192,737**  
 Filed: **Jun. 24, 2016**

U.S. Applications:

(63) Continuation-in-part of application No. 14/518,443, filed on Oct. 20, 2014, now abandoned.  
 (60) Provisional application No. 61/896,540, filed on Oct. 28, 2013.

(51) **Int. Cl.**

**A47B 97/04** (2006.01)  
**A47B 23/04** (2006.01)

(52) **U.S. Cl.**

CPC ..... **A47B 23/042** (2013.01)

(58) **Field of Classification Search**

CPC ..... **A47B 23/042**  
 USPC ..... 248/441.1, 454; D6/419, 406; D9/91  
 See application file for complete search history.

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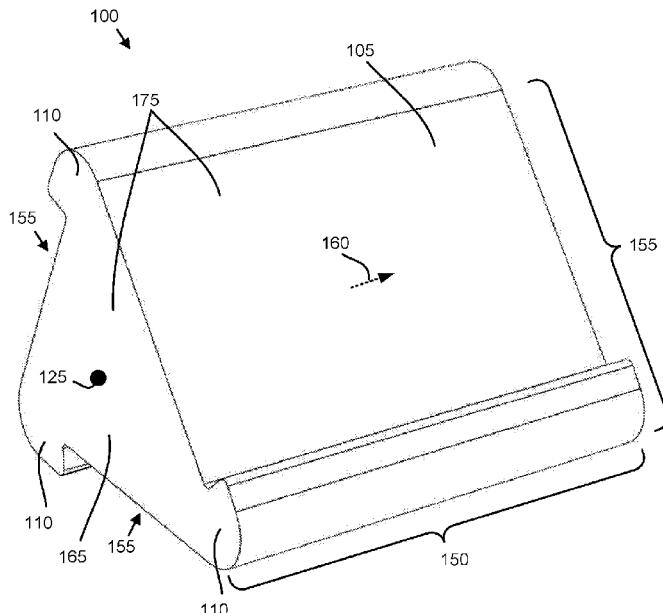
*Primary Examiner* — Cary E Wehner

(74) *Attorney, Agent, or Firm* — Schaffer IP Law, LLC

(57) **ABSTRACT**

For multiple viewing angle media support, and apparatus includes three support sides. Each support side includes a back support and an edge support. A top of each back support is in physical communication with an adjacent edge support clockwise about a central axis and each back support and each edge support is in physical communication with two ends of a solid interior. Each back support, each edge support, and each end is a surface of the solid interior, the solid interior is a pillow covered in fabric, a first viewing angle of the first back support is 36 degrees, a second viewing angle of the second back support is 74 degrees, and a third viewing angle of the third back support is 49 degrees.

**29 Claims, 4 Drawing Sheets**



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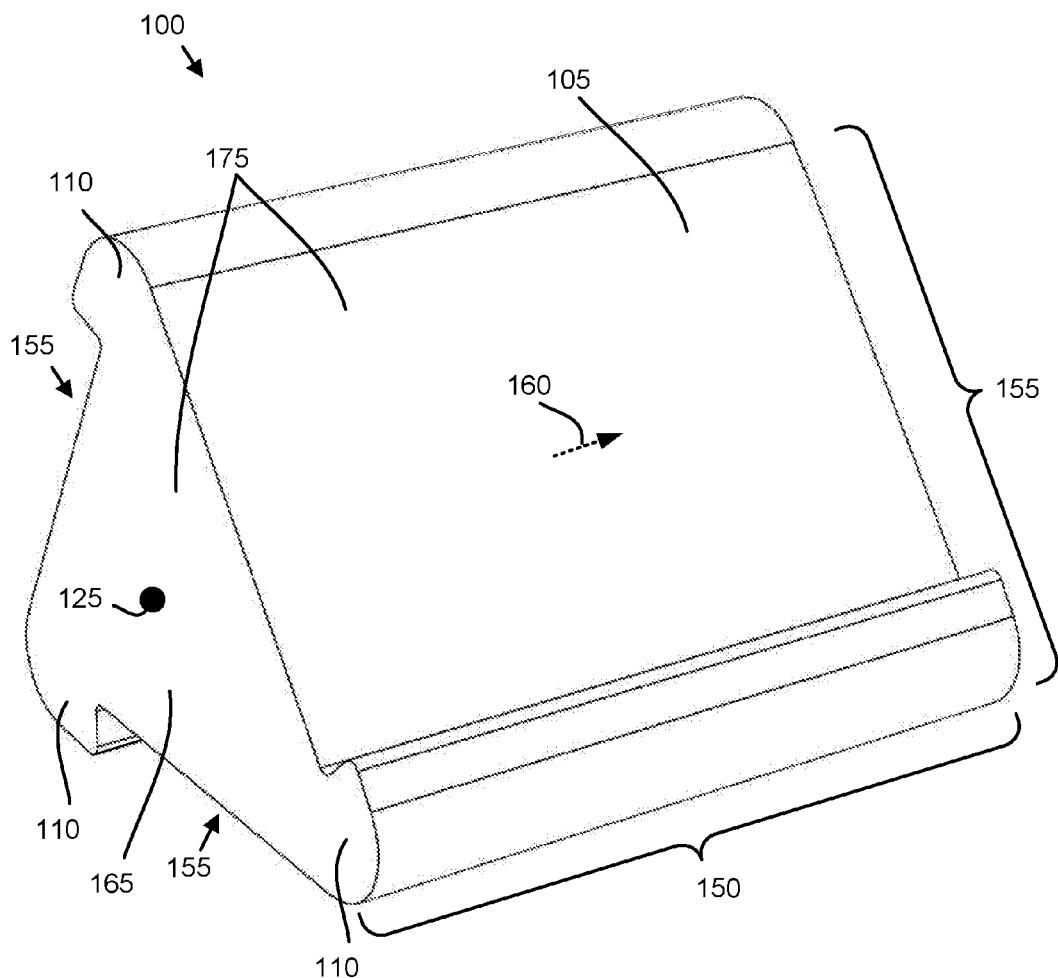


FIG. 1

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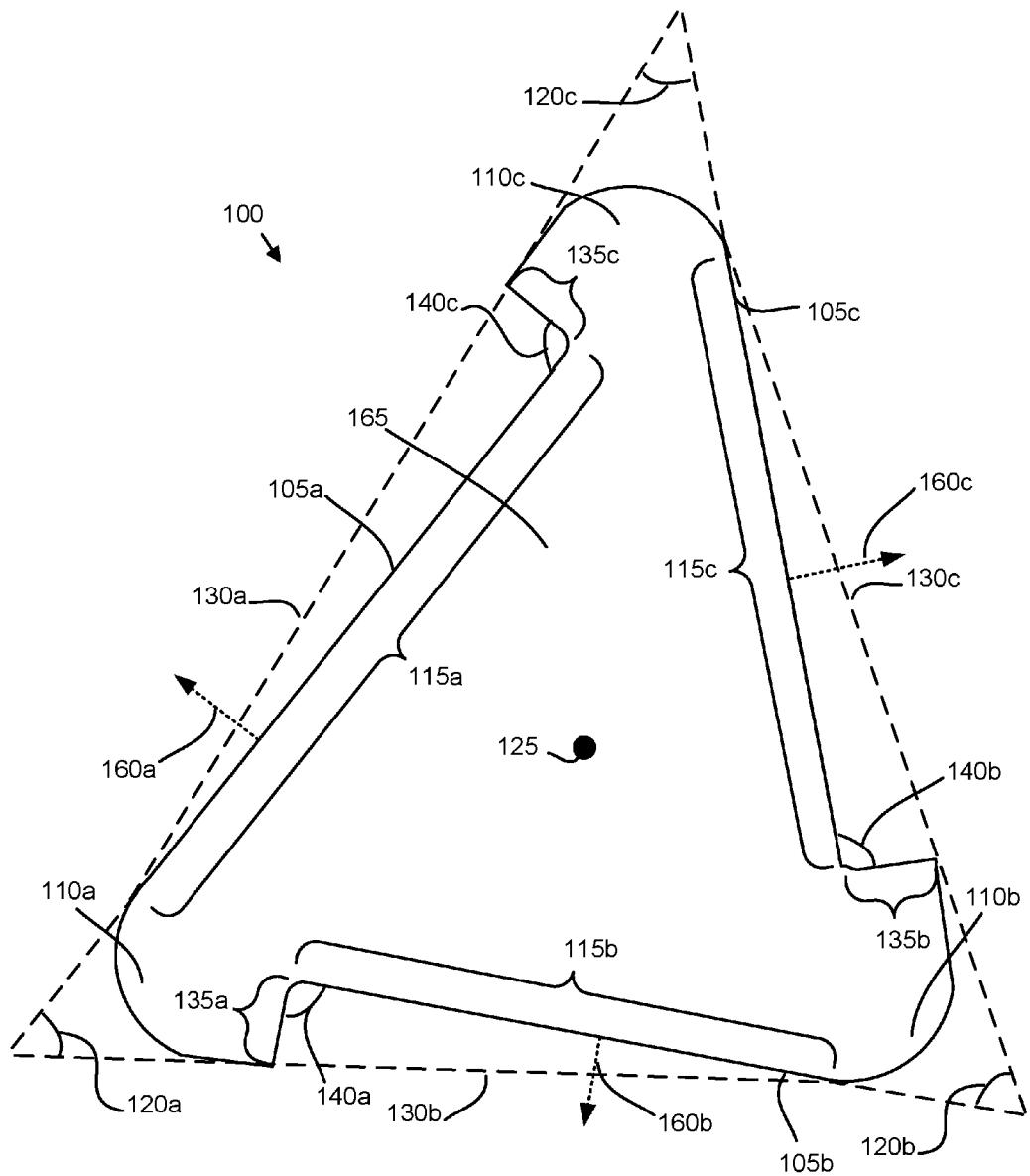


FIG. 2

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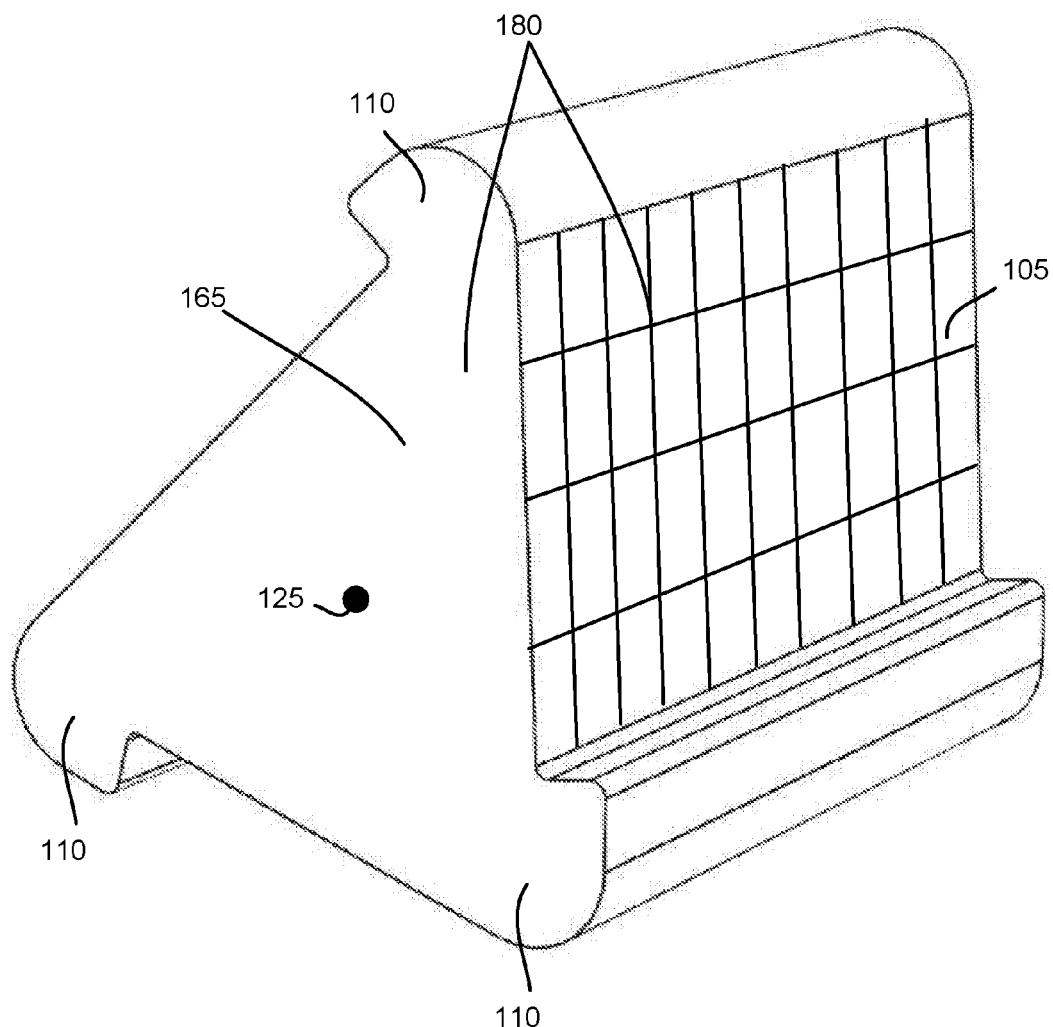


FIG. 3

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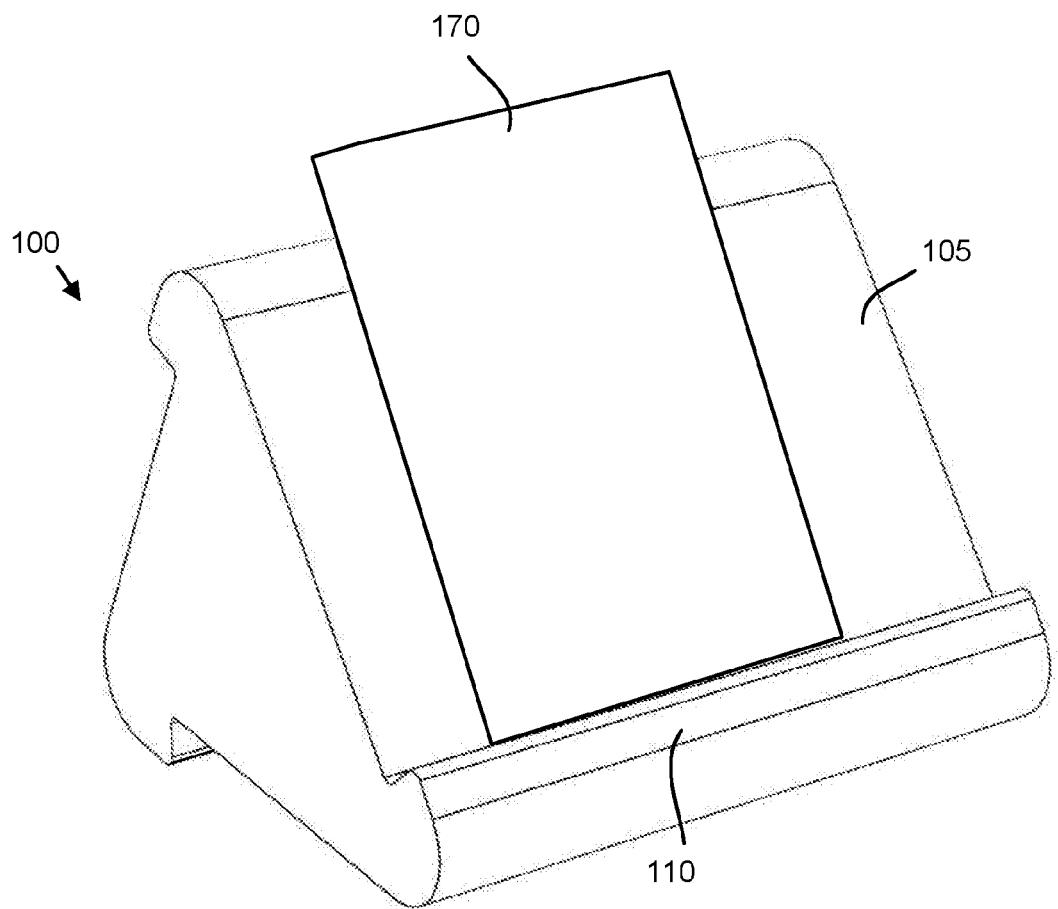


FIG. 4

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**MULTIPLE VIEWING ANGLE MEDIA SUPPORT**

Matter enclosed in heavy brackets [ ] appears in the original patent but forms no part of this reissue specification; matter printed in italics indicates the additions made by reissue; a claim printed with strikethrough indicates that the claim was canceled, disclaimed, or held invalid by a prior post-patent action or proceeding.

**CROSS-REFERENCE TO RELATED APPLICATIONS**

This is a continuation-in-part of and claims priority to U.S. patent application Ser. No. 14/518,443 entitled "MULTIPLE VIEWING ANGLE MEDIA SUPPORT" and filed on Oct. 20, 2014 for Bruce Cannon, which is incorporated herein by reference. U.S. patent application Ser. No. 14/518,443 claims priority to U.S. Provisional Patent Application No. 61/896,540 entitled "FLIPY EREADER PILLOW" and filed on Oct. 28, 2013 for Bruce Cannon, which is incorporated herein by reference.

**FIELD**

The subject matter disclosed herein relates to media support and more particularly relates to multiple viewing angle media support.

**BACKGROUND**

**Description of the Related Art**

It is often comfortable to support media such as electronic readers, tablet computers, magazines, and books while viewing the media.

**BRIEF DESCRIPTION OF THE DRAWINGS**

A more particular description of the embodiments briefly described above will be rendered by reference to specific embodiments that are illustrated in the appended drawings. Understanding that these drawings depict only some embodiments and are not therefore to be considered to be limiting of scope, the embodiments will be described and explained with additional specificity and detail through the use of the accompanying drawings, in which:

FIG. 1 is a perspective drawing illustrating one embodiment of a media support;

FIG. 2 is a side view drawing illustrating one embodiment of a media support;

FIG. 3 is a perspective drawing illustrating one alternate embodiment of a media support; and

FIG. 4 is a perspective drawing illustrating one embodiment of media disposed on a media support.

**DETAILED DESCRIPTION**

Reference throughout this specification to "one embodiment," "an embodiment," or similar language means that a particular feature, structure, or characteristic described in connection with the embodiment is included in at least one embodiment. Thus, appearances of the phrases "in one embodiment," "in an embodiment," and similar language throughout this specification may, but do not necessarily, all refer to the same embodiment, but mean "one or more but

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not all embodiments" unless expressly specified otherwise. The terms "including," "comprising," "having," and variations thereof mean "including but not limited to" unless expressly specified otherwise. An enumerated listing of items does not imply that any or all of the items are mutually exclusive and/or mutually inclusive, unless expressly specified otherwise. The terms "a," "an," and "the" also refer to "one or more" unless expressly specified otherwise.

Furthermore, the described features, advantages, and characteristics of the embodiments may be combined in any suitable manner. One skilled in the relevant art will recognize that the embodiments may be practiced without one or more of the specific features or advantages of a particular embodiment. In other instances, additional features and advantages may be recognized in certain embodiments that may not be present in all embodiments.

The description of elements in each figure may refer to elements of proceeding figures. Like numbers refer to like elements in all figures, including alternate embodiments of like elements.

FIG. 1 is a perspective drawing illustrating one embodiment of a media support 100. The media support 100 may position media at one of three varied and carefully chosen angles for viewing by a user. The media may be handheld media. In addition, the media may be an electronic reader, a tablet computer, a video display, a magazine, a book, or the like. Because the media may be handheld, it is often viewed while the user is sitting at a table with the media on the table, while the user is sitting with the media disposed in the user's lap, or while the user is lying down.

During extended periods of viewing, it may be comfortable for the user to prop up the media to reduce hand and arm fatigue. Unfortunately, the use of traditional pillows may position the media at a less than advantageous angle. In addition, during extended viewing periods, the user may shift position, resulting in a need for a support with a different viewing angle. For example, a user may shift from reading while sitting on a couch to reading while lying on the couch.

The embodiments described herein provide support for multiple viewing angles. The angles are carefully chosen to support the media on a table for a sitting user, in the lap of a sitting user, and on a lying user. As a result, the media support 100 provides a comfortable support at an appropriate angle for the most common viewing positions.

In the depicted embodiment, the media support 100 includes three support sides 155. Each support side 155 comprises a support back 105 and a support edge 110. The support sides 155 may be disposed about a central axis 125. The media support 100 may have a latitudinal length 150. The latitudinal length 150 may be in the range of 6 to 50 centimeters (cm). In a certain embodiment, the latitudinal length 150 is in the range of 9 to 25 cm. In one embodiment, the latitudinal length 150 is 15 cm.

In one embodiment, the latitudinal length 150 of an edge support 110 may be different from the latitudinal length 150 of the corresponding side support 155. The edge support latitudinal length 150 may be in the range of 2 to 10 cm. In a certain embodiment, the edge support latitudinal length 150 is in the range of 6 to 8 cm. In one embodiment, the edge support latitudinal length 150 is 7 cm.

The side supports 155 may be arranged to provide three different viewing angles 160 for three different user positions. Each viewing angle 160 is orthogonal to a support back 105. The arrangement of the side supports 155 are disclosed in greater detail in FIG. 2.

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In one embodiment, each back support 105 and each edge support 110 is a surface 175 of a solid. The solid media support 100 may have one or more ends 165. Each back support 105 and each edge support 110 may be in physical communication with two ends 165 of a solid interior.

The solid media support 100 may be a pillow. The solid interior may be foam. The foam may have an Indentation Force Deflection (IFD) of in the range of 15-30 kilograms at 25% indentation. In one embodiment, the surface 175 of the solid may be a fabric. Each back support 105, each edge support 110, and each end 165 may a surface 175 of the solid interior. The surface 175 of the solid interior may be a pillow is covered in fabric. In one embodiment, the fabric is ultra-suede.

A user may place the media support 100 on a table, in the user's lap, or on the user while lying down. The semi-rigid pillow feel of the media support 100 comfortably contacts the user while providing firm support for the media. The user may further rotate the media support 100 to select a back support 105 with a comfortable viewing angle 160. The user may place media on the edge support 110. The edge support 110 holds the media with the back of the media against the back support 105. As a result, the media may be viewed at the viewing angle 160.

FIG. 2 is a side view drawing illustrating one embodiment of a media support 100. The support backs 105 and the support edges 110 of the three support sides 155 are shown about an end 165. A top of each back support 105 is in physical communication with an adjacent edge support 110 about the central axis 125. A plane of a first back support 105a may be at a first plane angle 120a in a range of 50 to 60 degrees to a second virtual plane 130b between the top of a second back support 105b counterclockwise to the first back support 105a and an outer edge of a second edge support 110b counterclockwise to the first back support 105a. In addition, a plane of the second back support 105b may be at a second plane angle 120b in a range of 55 to 65 degrees to a third virtual plane 130c between the top of a third back support 105c counterclockwise to the second back support 105b and an outer edge of a third edge support 110c counterclockwise to the second back support 110b. A plane of a third back support 105c may be at a third plane angle 120c in a range of 50 to 75 degrees to a first virtual plane 130a between the top of the first back support 105a counterclockwise to the third back support 105c and an outer edge of the first edge support 110a counterclockwise to the third back support 105c.

In one embodiment, the first back support 105a has a longitudinal length 115a in the range of 12 to 26 cm, the second back support 105b has a longitudinal length 115b in the range of 9 to 21 cm, and the third back support 105c has a longitudinal length 115c in the range of 10 to 22 cm. In a certain embodiment, the first longitudinal length 115a is 19 cm, the first plane angle 120a is 60 degrees, the second longitudinal length 115b is 15 cm, the second plane angle 120b is 68 degrees, the third longitudinal length 115c is 17 cm, and the third plane angle 120c is 52 degrees.

The arrangement of the longitudinal lengths 115 and the plane angles 120 generate three distinct viewing angles 160. In one embodiment, the first viewing angle 120a may be 36 degrees, the second viewing angle 120b may be 74 degrees, and the third viewing angle 120C may be 49 degrees.

In one embodiment, each edge support 110 forms an edge angle 140 with an adjacent back support 105. The edge angle 140 may be in the range of 85 to 120 degrees. The edge angle 140 may be 90 degrees. Each edge support 110 may have an

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edge support width 135. The edge support width 135 may be in the range of 1 to 5 cm. In a certain embodiment, the edge support width 135 is 2 cm.

FIG. 3 is a perspective drawing illustrating one alternate embodiment of a media support 100. In the depicted embodiment, each back support 105 and each edge support 110 is a surface 180 of a frame. Each end 165 may also be a surface 180 of a frame. The frame may include a molded mashed, a fabric mesh, a wire mesh, or the like. In the 10 depicted embodiment, the media support 100 includes ends 165. Alternatively, there may be no ends 165 on the media support 100.

FIG. 4 is a perspective drawing illustrating one embodiment of media 170 disposed on the media support 100. A 15 bottom edge of the media 170 is disposed in the edge support 110 while the back of the media 170 is disposed against a back support 105.

The embodiments arrange three support sides 155 to generate three distinct viewing angles 160. Each viewing 20 angle 160 is chosen for a specific viewing orientation. The first viewing angle 160a may be employed when the media support 100 and the media is disposed in the user's lap. The second viewing angle 160b may be used when the media support 100 and the media is disposed on a table and the user 25 is sitting upright. In addition, the 3rd viewing angle 160c may be used when the user is lying down and the media support 100 is disposed on the user.

When the user changes position, the media support 100 may be quickly rotated to provide a different viewing angle 30 160. As a result, the media support 100 is quickly deployed to provide the appropriate viewing angle 160. In addition, the comfort of the user is greatly enhanced as the media may be viewed at the appropriate viewing angle 160 without the user holding the media.

The media support 100 has been marketed as the "Flipy Tablet Pillow" since 2013 at a retail price of \$49.98. Because 35 of the media support's unique properties, it has enjoyed significant commercial success, with 800 units sold in 2013, 2,233 units in 2014, 925 units in 2015 and 997 units 40 year-to-date in 2016.

Embodiments may be practiced in other specific forms. The described embodiments are to be considered in all respects only as illustrative and not restrictive. The scope of the invention is, therefore, indicated by the appended claims 45 rather than by the foregoing description. All changes which come within the meaning and range of equivalency of the claims are to be embraced within their scope.

What is claimed is:

- An apparatus comprising:  
three support sides, each support side comprising a back support and an edge support, wherein a top of each back support is in physical communication with an adjacent edge support clockwise about a central axis and each back support and each edge support is in physical communication with two ends of a solid interior, each edge support comprises an edge support width of 2 centimeters (cm) with an edge angle of 90 degrees to an adjacent back support, a face of each edge support width oriented clockwise about the central axis, a plane of a first back support is at a first plane angle of 60 degrees to a second virtual plane between the top of a second back support counterclockwise to the first back support and an outer edge of a second edge support counterclockwise to the first back support, a plane of the second back support is at a second plane angle of 80 degrees to a third virtual plane between the top of a third back support counterclockwise to the

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second back support and an outer edge of a third edge support counterclockwise to the second back support, a plane of a third back support is at a third plane angle of 40 degrees to a first virtual plane between the top of the first back support counterclockwise to the third back support and an outer edge of the first edge support counterclockwise to the third back support, and wherein each back support, each edge support, and each end is a surface of the solid interior, the solid interior is a pillow covered in fabric, a first viewing angle of the first back support is 36 degrees, a second viewing angle of the second back support is 74 degrees, and a third viewing angle of the third back support is 49 degrees.

2. The apparatus of claim 1, wherein the first back support has a longitudinal length in the range of 12 to 26 centimeters (cm), the second back support has a longitudinal length in the range of 9 to 21 cm, and the third back support has a longitudinal length in the range of 10 to 22 cm.

3. The apparatus of claim 2, wherein the first longitudinal length is 19 cm, the first plane angle is 60 degrees, the second longitudinal length is 15 cm, the second plane angle is 68 degrees, the third longitudinal length is 17 cm, and the third plane angle is 52 degrees.

4. The apparatus of claim 1, wherein each back support has a latitudinal length in the range of 9 to 25 cm.

5. The apparatus of claim 4, wherein each back support has a latitudinal length of 15 cm.

6. The apparatus of claim 1, wherein each edge support has a latitudinal length in the range of 2 to 10 cm.

7. The apparatus of claim 6, wherein each edge support has a latitudinal length of 7 cm.

8. The apparatus of claim 1, wherein each edge support has an edge support width in the range of 1 to 5 centimeters (cm).

9. The apparatus of claim 1, wherein a plane of each edge support forms an edge angle in the range of 85 to 120 degrees with an adjacent back support.

10. The apparatus of claim 9, wherein the edge angle is 90 degrees.

11. The apparatus of claim 1, wherein a latitudinal length of each of the first, second, and third edge supports is different from a latitudinal length of the corresponding first, second, and third side supports.

12. A media support apparatus comprising:  
a body having a first support back, a second support back, and a third support back disposed about a central axis; a first support edge disposed between the first support back and the second support back, the first support back and first support edge are configured to support a media device at a first support angle;

a second support edge disposed between the second support back and third support back, the second support back and second support edge are configured to support a media device at a second support angle; a third support edge disposed between the third support back and first support back, the third support back and third support edge are configured to support a media device at a third support angle, wherein each edge support comprises an edge support width with an edge angle in the range of 85 to 120 degrees to an adjacent support back, a face of each edge support width oriented clockwise about the central axis;

wherein the media support apparatus is configured to be rotated about the central axis so that the body can rest on a horizontal support in any one of three positions including on a first virtual plane between a top of the

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second support back and an outer edge of the second edge support, on a second virtual plane between a top of the third support back and an outer edge of the third edge support, and on a third virtual plane between a top of the first support back and an outer edge of the first edge support; and

wherein the media support apparatus is configured to provide a first viewing angle of the media device when the media support apparatus body rests on the first virtual plane and the media device is supported at the first support angle, a second viewing angle when the media support apparatus body rests on the second virtual plane and the media device is supported at the second support angle, and a third viewing angle when the media support apparatus body rests on the third virtual plane and the media device is supported at the third support angle, wherein the first viewing angle, the second viewing angle, and the third viewing angle are different from one another.

13. The apparatus of claim 12, wherein the first support angle is between 50 and 60 degrees to the second virtual plane, the second support angle is between 55 and 65 degrees to the third virtual plane, and the third support angle is between 50 and 75 degrees to the first virtual plane.

14. The apparatus of claim 12, wherein the first support angle is 60 degrees to the second virtual plane, the second support angle is 68 degrees to the third virtual plane, and the third support angle is 52 degrees to the first virtual plane.

15. The apparatus of claim 12, wherein the edge support angle is 90 degrees.

16. The apparatus of claim 15 wherein the edge support width is 2 cm.

17. The apparatus of claim 12, wherein the body includes three solid corners, with each of the corners interposed between two adjacent support backs and including a respective edge support.

18. The apparatus of claim 12, wherein the body is foam having an indentation force deflection (IFD) in the range of 15-30 kilograms at 25% indentation.

19. The apparatus of claim 12, wherein the edge support width is in the range of 1 to 5 cm.

20. An apparatus comprising:  
three support sides, each support side comprising a back support and an edge support,

wherein a top of each back support is in physical communication with an adjacent edge support clockwise about a central axis and each back support and each edge support is in physical communication with two ends,

wherein each edge support comprises an edge support width with an edge angle to an adjacent back support in the range of 85 to 120 degrees to an adjacent back support,

wherein a face of each edge support width is oriented clockwise about the central axis,

wherein a plane of a first back support is at a first plane angle to a second virtual plane between the top of a second back support counterclockwise to the first back support and an outer edge of a second edge support counterclockwise to the first back support,

wherein a plane of the second back support is at a second plane angle to a third virtual plane between the top of a third back support counterclockwise to the second back support and an outer edge of a third edge support counterclockwise to the second back support,

wherein a plane of a third back support is at a third plane angle to a first virtual plane between the top of the first

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*back support counterclockwise to the third back support and an outer edge of the first edge support counterclockwise to the third back support, wherein the first plane angle, the second plane angle, and the third plane angle are different from one another and are configured to provide a first viewing angle, a second viewing angle, and a third viewing angle that are different from one another; and wherein each back support, each edge support, and each end is a surface of an interior.*

21. The apparatus of claim 20, wherein the first back support has a longitudinal length in the range of 12 to 26 centimeters (cm), the second back support has a longitudinal length in the range of 9 to 21 cm, and the third back support has a longitudinal length in the range of 10 to 22 cm.

22. The apparatus of claim 21, wherein the first longitudinal length is 19 cm, the first plane angle is 60 degrees, the second longitudinal length is 15 cm, the second plane angle

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*is 68 degrees, the third longitudinal length is 17 cm, and the third plane angle is 52 degrees.*

23. The apparatus of claim 20, wherein each back support has a latitudinal length in the range of 9 to 25 cm.

24. The apparatus of claim 23, wherein each back support has a latitudinal length of 15 cm.

25. The apparatus of claim 20, wherein each edge support has a latitudinal length in the range of 2 to 10 cm.

26. The apparatus of claim 25, wherein each edge support has a latitudinal length of 7 cm.

27. The apparatus of claim 20, wherein each edge support has an edge support width in the range of 1 to 5 centimeters (cm).

28. The apparatus of claim 20, wherein a plane of each edge support forms an edge angle of 90 degrees with an adjacent back support.

29. The apparatus of claim 28, wherein each edge support has an edge support width of 2 centimeters (cm).

\* \* \* \* \*

## EXHIBIT C

# ONTEL PILLOW PAD INFRINGEMENT ANALYSIS – U.S. PAT. NO. 9,642,454

## U.S. Patent No. 9,642,454 – Ontel, Telebrands, & Retailer Defendants

### Claim 1

Happy Product, Inc. (“HPI”) provides evidence of infringement of claim 1 of U.S. Patent No. 9,642,454 (hereinafter “the ‘454 patent”) by Ontel’s Pillow Pad (“Ontel”). In support thereof, HPI provides the following claim charts.

“Accused Products” as used herein is defined in HPI’s Complaint, and includes, but is not limited to, all versions of Ontel’s Pillow Pad product containing three rounded ledges, as well as any other multi-angle soft tablet stands having three rounded ledges sold or offered by sale by Ontel and/or each Retailer Defendant. It is further understood, on information and belief, that Ontel is responsible, in material part, for the functionality and design of those products that it provides.

These claim charts demonstrate each Defendant’s infringement, and provide notice of such infringement, by comparing each element of the asserted claims to corresponding components, aspects, and/or features of the Accused Products. These claim charts are not intended to constitute an expert report on infringement. These claim charts include information provided by way of example, and not by way of limitation.

The analysis set forth below is based only upon information from available resources regarding the Accused Products, as each Defendant has not yet provided any further non-public information. An analysis of each Defendant’s (or other third parties’) technical documentation and/or software source code may assist in fully identifying all infringing features and functionality. Accordingly, HPI reserves the right to supplement this infringement analysis once such information is made available to HPI. Furthermore, HPI reserves the right to revise this infringement analysis, as appropriate, upon issuance of a court order construing any terms recited in the asserted claims. HPI provides this evidence of infringement and related analysis without the benefit of claim construction or expert reports or discovery. HPI reserves the right to supplement, amend or otherwise modify this analysis and/or evidence based on any such claim construction or expert reports or discovery.

Unless otherwise noted, HPI contends that each Defendant directly infringes the ‘454 patent in violation of 35 U.S.C. § 271(a) at least by selling and offering to sell at least the Accused Products. The following exemplary analysis demonstrates that infringement.

Unless otherwise noted, HPI further contends that the evidence below supports a finding of indirect infringement under 35 U.S.C. § 271(b) in conjunction with other evidence of liability under one or more of those subsections. As set forth in the Complaint, Ontel and Telebrands each induces others to make, use, sell, import, or offer for sale in the United States, or has induced others to make, use, sell, import, or offer for sale in the past, without authority products, equipment, or services that infringe at least claim 1 of the ‘454 patent, including without limitation, the Accused Products.

Unless otherwise noted, HPI believes and contends that each element of each claim asserted herein is literally met through each Defendant’s provision of the Accused Products. However, to the extent that any Defendant attempts to allege that any asserted claim

**ONTEL PILLOW PAD INFRINGEMENT ANALYSIS – U.S. PAT. NO. 9,642,454**

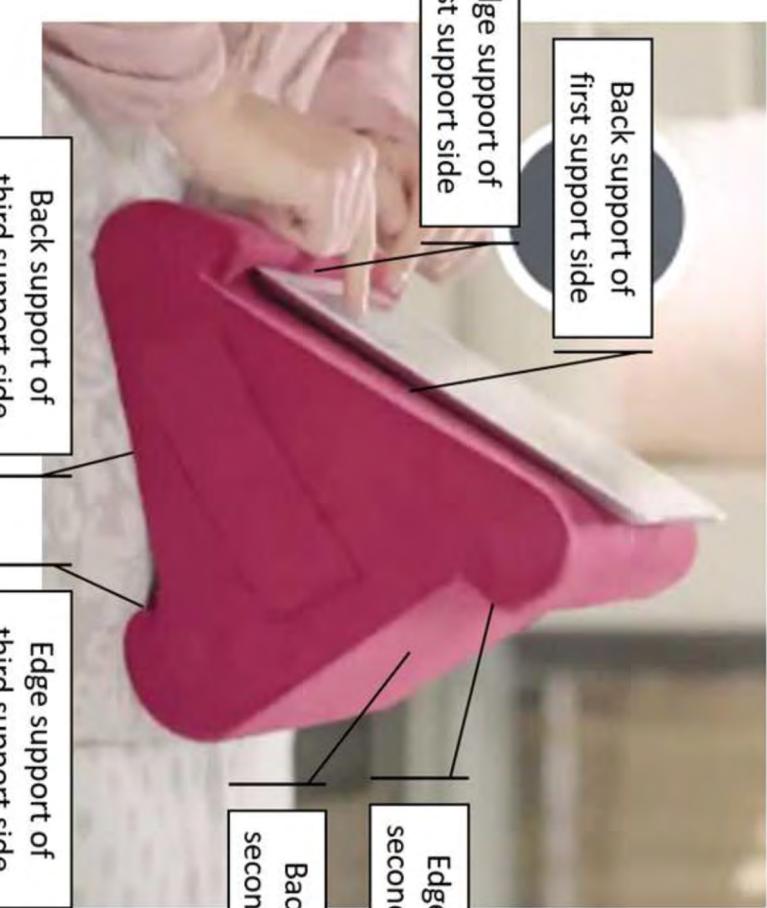
element is not literally met, HPI believes and contends that such elements are met under the doctrine of equivalents. More specifically, in its investigation and analysis of the Accused Products, HPI did not identify any substantial differences between the elements of the patent claims and the corresponding features of the Accused Products, as set forth herein. In each instance, the identified feature of the Accused Products performs at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.

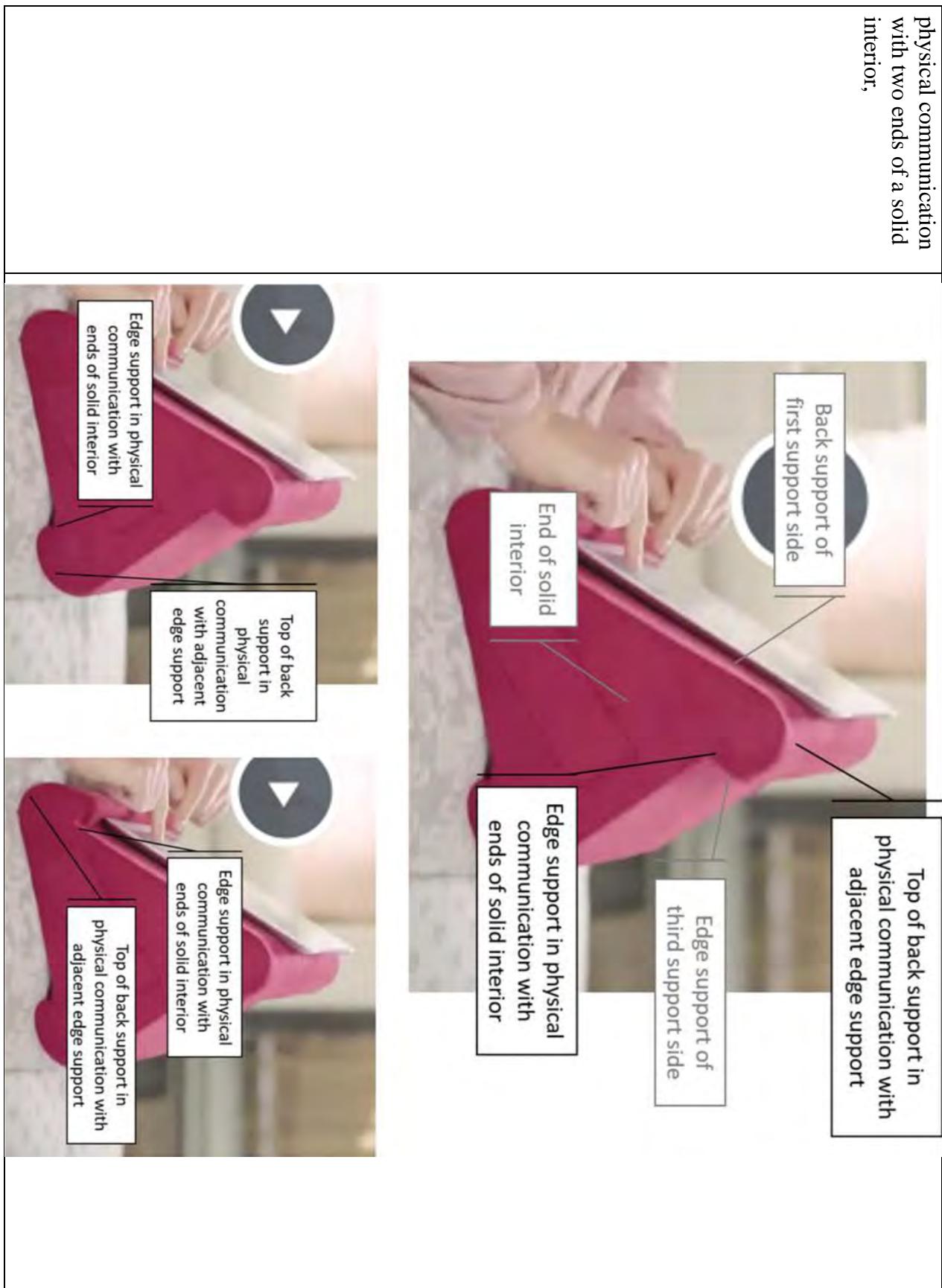
To the extent the chart of an asserted claim relies on evidence about certain specifically identified Accused Products, HPI asserts that, on information and belief, any similarly functioning instrumentalities also infringes the charted claim. HPI reserves the right to amend this infringement analysis based on other products made, used, sold, imported, or offered for sale by each Defendant. HPI also reserves the right to amend this infringement analysis by citing other claims of the '454 patent, not listed in the claim chart, that are infringed by the Accused Products. HPI further reserves the right to amend this infringement analysis by adding, subtracting, or otherwise modifying content in the "Accused Products" column of each chart.

**ONTEL PILLOW PAD INFRINGEMENT ANALYSIS – U.S. PAT. NO. 9,642,454**

Claim 1	Accused Products
1. An apparatus comprising:	Each Accused Product is an apparatus:  

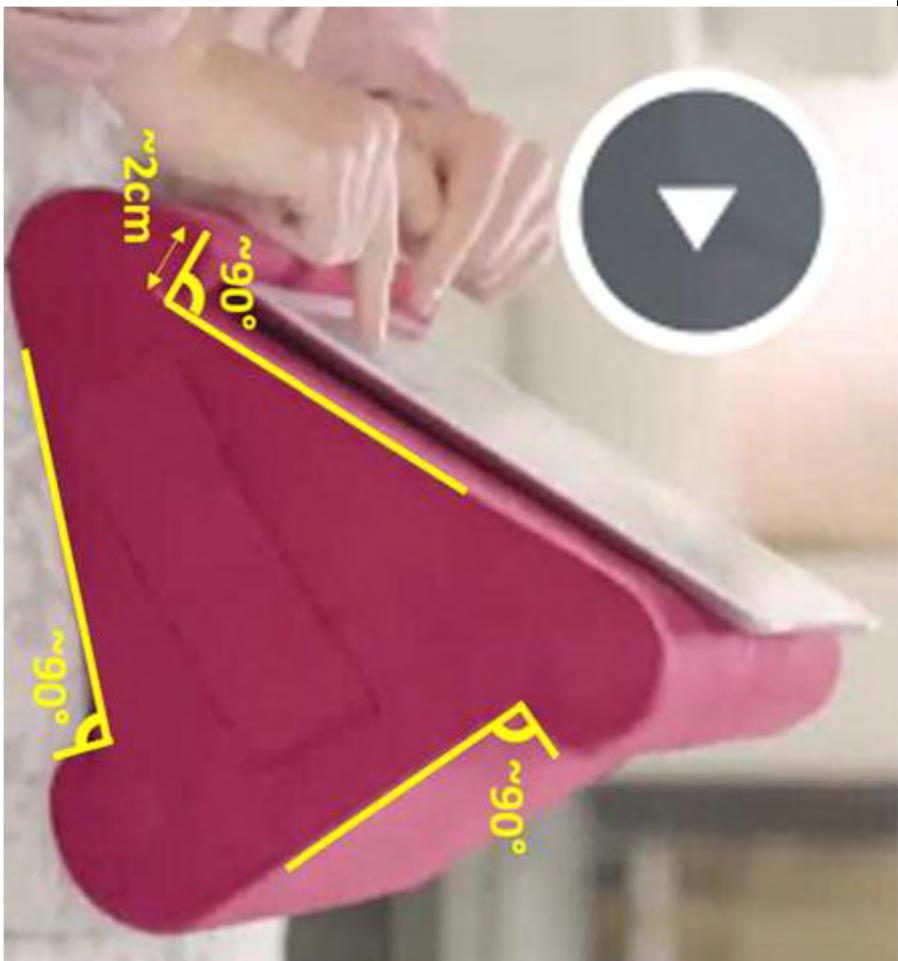
**ONTEL PILLOW PAD INFRINGEMENT ANALYSIS – U.S. PAT. NO. 9,642,454**

three support sides, each support side comprising a back support and an edge support,	As shown below, each Accused Product has three support sides. Each support side comprises a <b>back support</b> and an <b>edge support</b> .
wherein a top of each back support is in physical communication with an adjacent edge support clockwise about a central axis and each back support and each edge support is in	 <p>Each Accused Product has a top of each back support in physical communication with an adjacent edge support clockwise about a central axis. Each back support and each edge support is in physical communication with two ends of a solid interior.</p>

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	<p>As recited further on in claim 1, “the solid interior <i>is</i> a pillow covered in fabric,” which does not require the pillow (which is inside the fabric cover) itself to be solid, or lack any hollows, cutouts, cavities, or other lacunae. As shown above, the end of the interior is solid at the very least, on the exterior of the Accused Product.</p> <p>To the extent that Ontel or any Defendant would argue that this element may not be met in one or more Accused Products due to hollows, cutouts, cavities, or other lacunae of any size disposed within the interior of the product, this element is still satisfied under the doctrine of equivalents.</p> <p>In particular, there are no substantial differences between this claim element and the corresponding features of any Accused Product, as set forth herein, as demonstrated by the solid appearance on the exterior of the Accused Product. The identified features of the Accused Products perform at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.</p> <p>In particular, an interior that may have a hollow, cutout, cavity, or lacuna performs substantially the same function (providing structural integrity sufficient to support a tablet) in substantially the same way (by substantially maintaining and viewing angle shape under compression of the weight of the tablet or other object being viewed) to achieve substantially the same result (providing multiple viewing angles for a tablet or other viewing object).</p>
each edge support comprises an edge support width of 2 centimeters (cm) with an edge angle of 90 degrees to an adjacent back support,	<p><b>Each edge support in the Accused Products comprises an edge support width of 2 centimeters with an edge angle of 90 degrees to an adjacent back support.</b></p>

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To the extent that Ontel or any Defendant would argue that this element may not be met in one or more Accused Products due to differences in the angle of attachment and/or the width of the edge support, this element is still satisfied under the doctrine of equivalents.

In particular, there are no substantial differences between this claim element and the corresponding features of any Accused Product, as set forth herein, as demonstrated by the solid appearance on the exterior of the Accused Product. The identified feature of the Accused Products performs at least

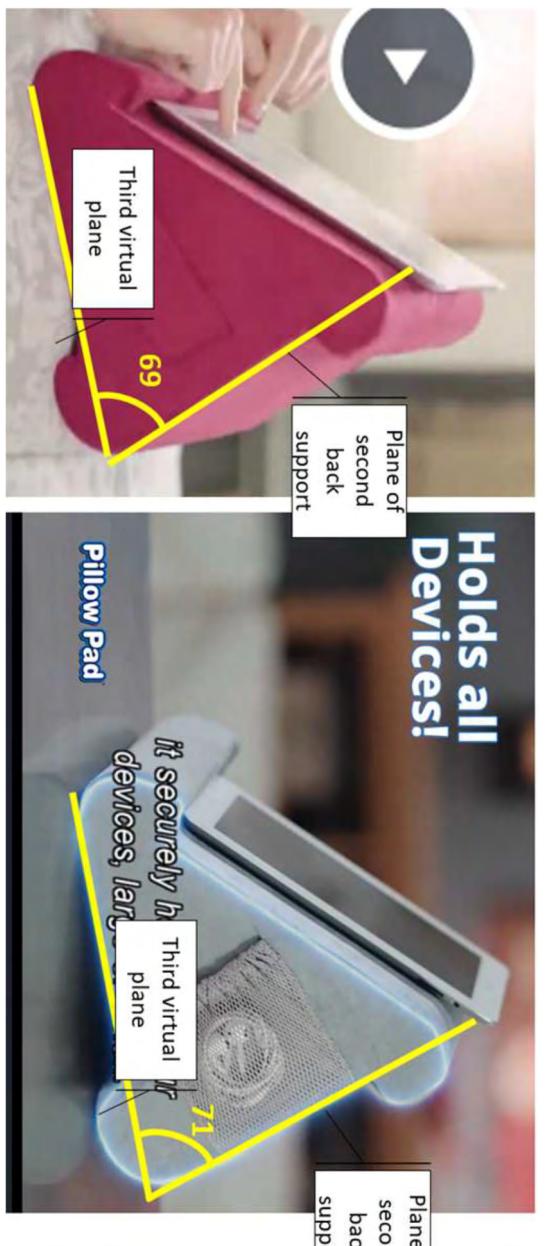
## ONTEL PILLOW PAD INFRINGEMENT ANALYSIS – U.S. PAT. NO. 9,642,454

<p>substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.</p> <p>In particular, angles that approximate 90 degrees and edge widths that are approximately 2cm each perform substantially the same function (providing a particular viewing angle and sufficient space to hold the object being viewed) in substantially the same way (by maintaining an appropriate viewing angle when an object is being displayed and having sufficient space on the edge to hold and display the object) to achieve substantially the same result (successfully disposing an object for display at a particular angle).</p>	<p>a face of each edge support width oriented clockwise about the central axis,</p> <p><b>Each Accused Product has a face of each edge support width oriented clockwise about the central axis, as shown below:</b></p> 
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**ONTEL PILLOW PAD INFRINGEMENT ANALYSIS – U.S. PAT. NO. 9,642,454**

<p>a plane of a first back support is at a first plane angle of 60 degrees to a second virtual plane between the top of a second back support counterclockwise to the first back support and an outer edge of a second edge support counterclockwise to the first back support,</p>	<p><b>This element is met for each Accused Product at least under the doctrine of equivalents.</b></p> <p>In particular, there are no substantial differences between this claim element and the corresponding features of any Accused Product, as set forth herein.</p>
<p>The identified feature of the Accused Products performs at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.</p> <p>In particular, an angle that approximates 60 degrees performs substantially the same function (providing a particular viewing angle) in substantially the same way (by maintaining a particular viewing angle a when an object is being displayed based on a first plane angle of approximately 60 degrees to a second virtual plane) to achieve substantially the same result (successfully disposing an object for display at a particular angle based on the first plane angle of approximately 60 degrees). See <i>Adams Respiratory Therapeutics, Inc. v. Perrigo Co.,</i> 616 F.3d 1283 (Fed. Cir. 2010)</p>	

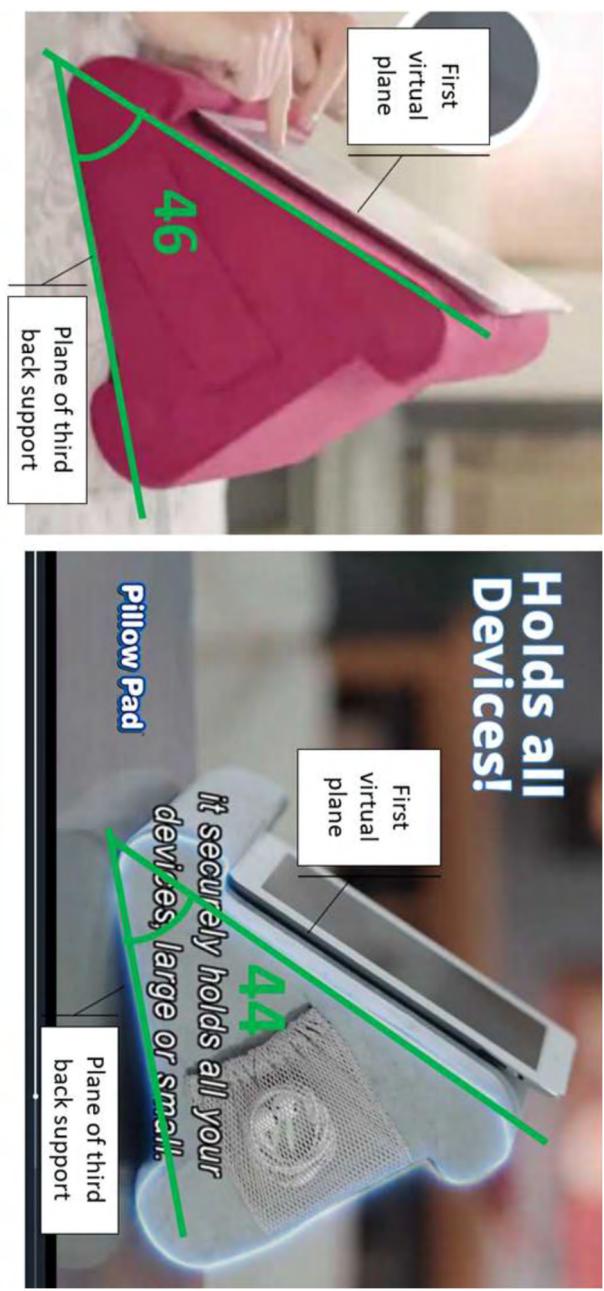
## ONTEL PILLOW PAD INFRINGEMENT ANALYSIS – U.S. PAT. NO. 9,642,454

<p>a plane of the second back support is at a second plane angle of 80 degrees to a third virtual plane between the top of a third back support counterclockwise to the second back support and an outer edge of a third edge support counterclockwise to the second back support,</p>	<p><b>This element is met for each Accused Product at least under the doctrine of equivalents.</b></p>
<p>The identified feature of the Accused Products performs at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.</p> <p>In particular, an angle that approximates 80 degrees performs substantially the same function (providing a particular viewing angle) in substantially the same way (by maintaining a particular viewing angle a when an object is being displayed based on a first plane angle of approximately 80 degrees to a second virtual plane) to achieve substantially the same result (successfully disposing an object for display at a particular angle based on the first plane angle of approximately 80 degrees). See <i>Adams Respiratory Therapeutics, Inc. v. Perrigo Co.</i>, 616 F.3d 1283 (Fed. Cir. 2010)</p>	 <p>In particular, there are no substantial differences between this claim element and the corresponding features of any Accused Product, as set forth herein.</p>
<p>a plane of a third back support is at a third plane</p>	<p><b>This element is met for each Accused Product at least under the doctrine of equivalents.</b></p>

## ONTEL PILLOW PAD INFRINGEMENT ANALYSIS – U.S. PAT. NO. 9,642,454

angle of 40 degrees to a first virtual plane between the top of the first back support counterclockwise to the third back support and an outer edge of the first edge support counterclockwise to the third back support,

In particular, there are no substantial differences between this claim element and the corresponding features of any Accused Product, as set forth herein.



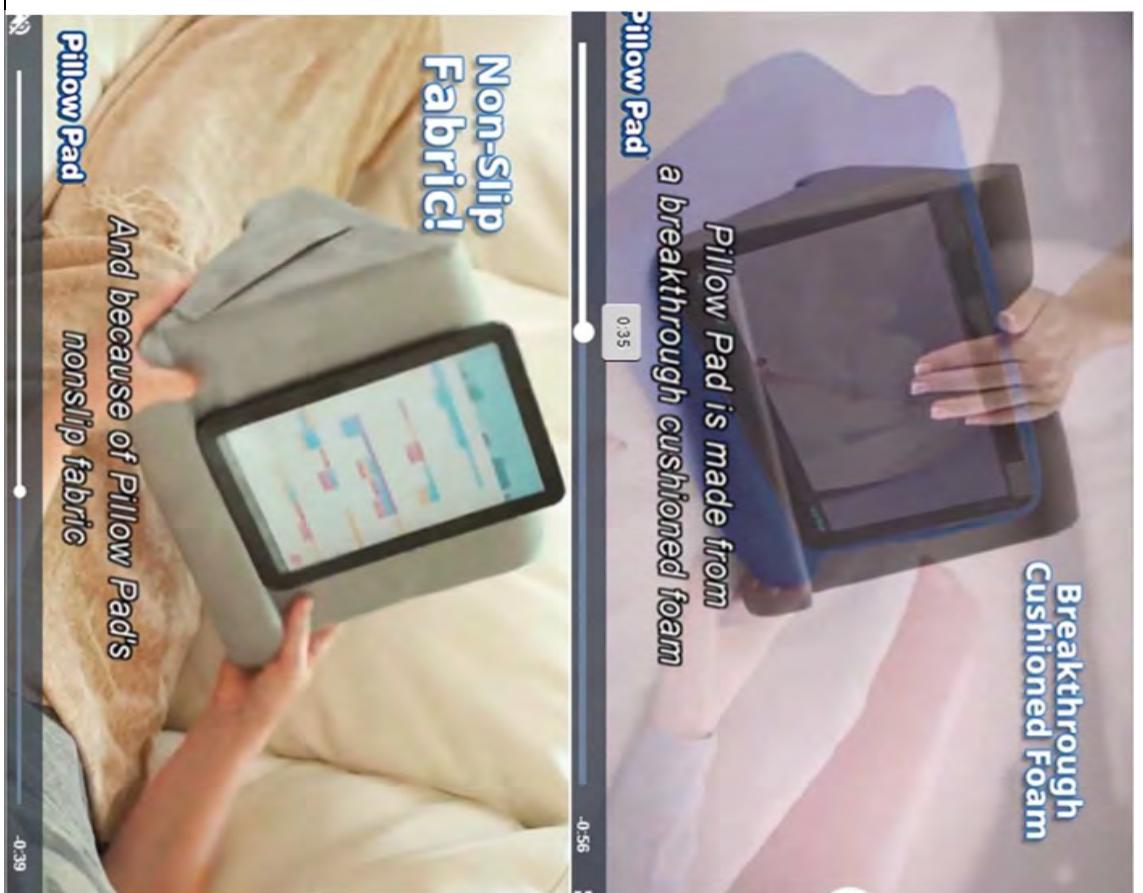
The identified feature of the Accused Products performs at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.

In particular, an angle that approximates 40 degrees performs substantially the same function (providing a particular viewing angle) in substantially the same way (by maintaining a particular viewing angle a when an object is being displayed based on a first plane angle of approximately 40 degrees to a second virtual plane) to achieve substantially the same result (successfully disposing an object for display at a particular angle based on the first plane angle of approximately 40 degrees). See *Adams Respiratory Therapeutics, Inc. v. Perrigo Co.*, 616 F.3d 1283 (Fed. Cir. 2010).

**ONTEL PILLOW PAD INFRINGEMENT ANALYSIS – U.S. PAT. NO. 9,642,454**

and wherein each back support, each edge support, and each end is a surface of the solid interior,

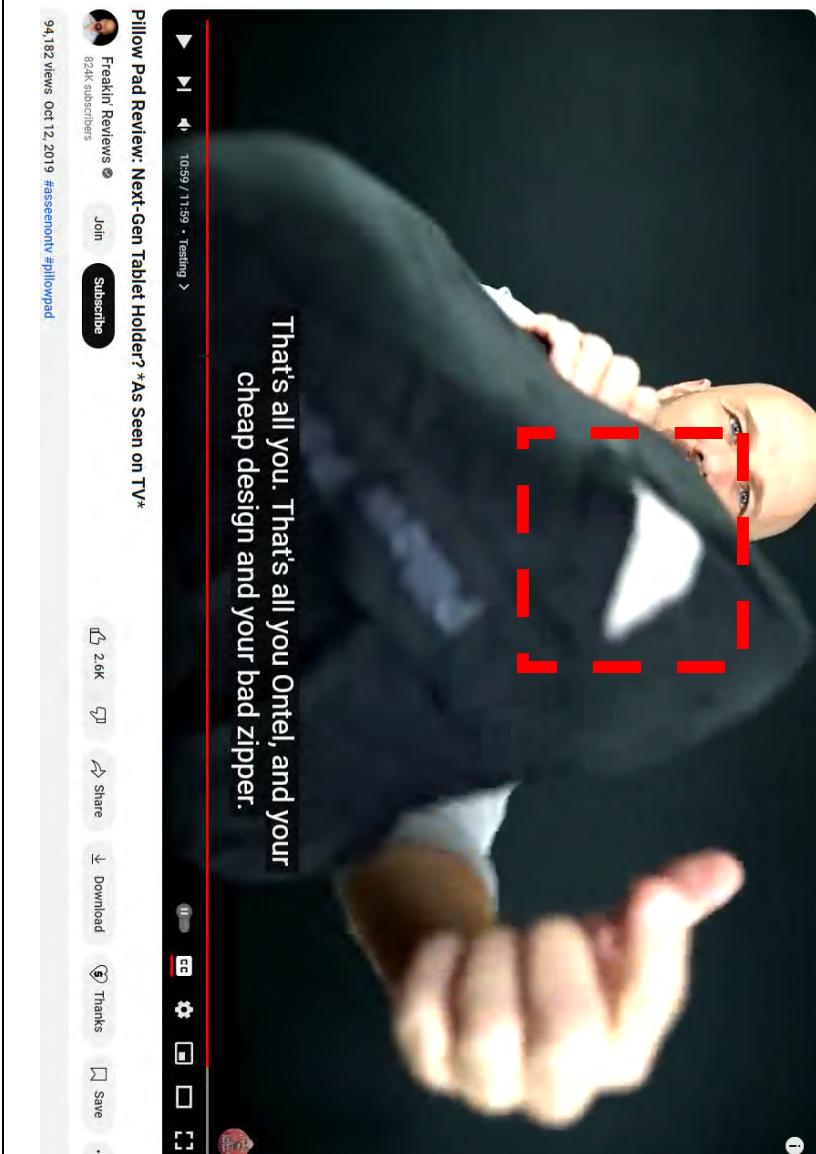
In each Accused Product, each back support, each edge support, and edge end is a surface of the solid interior.



**ONTEL PILLOW PAD INFRINGEMENT ANALYSIS – U.S. PAT. NO. 9,642,454**

the solid interior is a pillow covered in fabric,

In each Accused Product, the solid interior is a pillow covered in fabric.

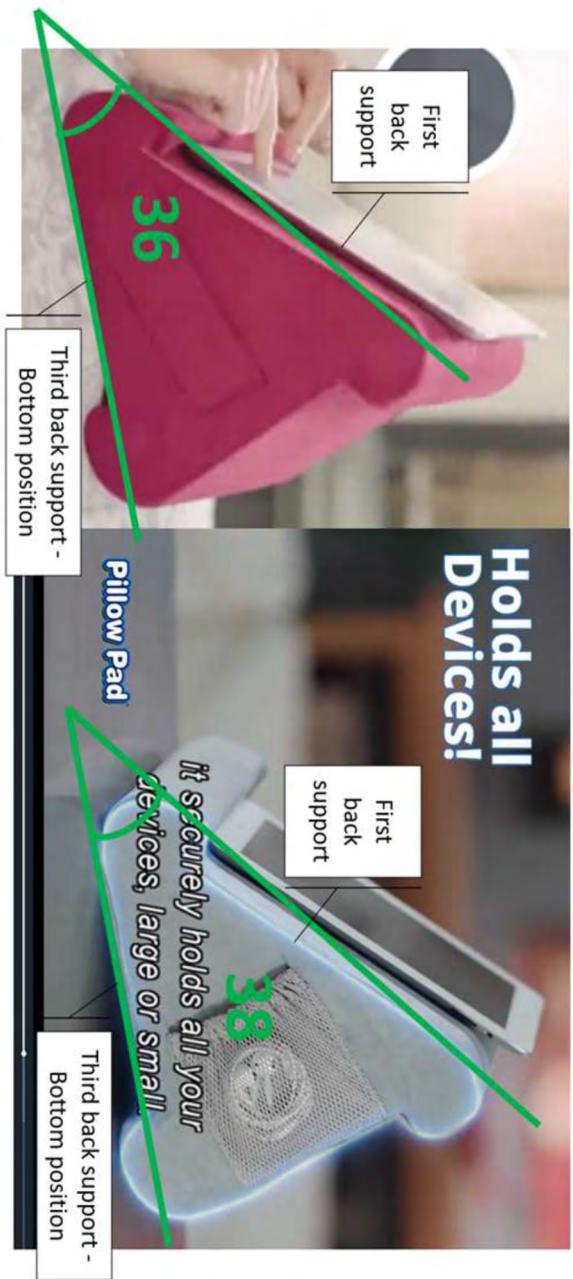


**ONTEL PILLOW PAD INFRINGEMENT ANALYSIS – U.S. PAT. NO. 9,642,454**

<p>a first viewing angle of the first back support is 36 degrees,</p> <p>In the alternative, this element is met for each Accused Product at least under the doctrine of equivalents.</p>	<p><b>Pillow Pad</b> Built-In Side Pocket For Accessories</p> <p>3 Viewing Angles!</p> <p>Machine Washable Cover</p>

**ONTEL PILLOW PAD INFRINGEMENT ANALYSIS – U.S. PAT. NO. 9,642,454**

- . In particular, there are no substantial differences between this claim element and the corresponding features of any Accused Product, as set forth herein.



The identified feature of the Accused Products performs at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.

In particular, an angle that approximates 36 degrees performs substantially the same function (providing a particular viewing angle) in substantially the same way (by maintaining a particular viewing angle a when an object is being displayed based on a first plane angle of approximately 36 degrees to a second virtual plane) to achieve substantially the same result (successfully disposing an object for display at a particular angle based on the first plane angle of approximately 36 degrees). See *Adams Respiratory Therapeutics, Inc. v. Perrigo Co.*, 616 F.3d 1283 (Fed. Cir. 2010).

a second viewing angle of the second back support is 74 degrees, and

**This element is met for each Accused Product at least under the doctrine of equivalents.**

In particular, there are no substantial differences between this claim element and the corresponding features of any Accused Product, as set forth herein.

## ONTEL PILLOW PAD INFRINGEMENT ANALYSIS – U.S. PAT. NO. 9,642,454

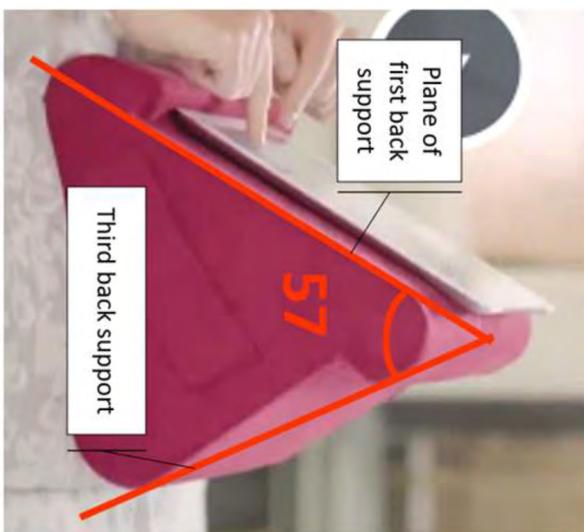


The identified feature of the Accused Products performs at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.

In particular, an angle that approximates 74 degrees performs substantially the same function (providing a particular viewing angle) in substantially the same way (by maintaining a particular viewing angle a when an object is being displayed based on a first plane angle of approximately 74 degrees to a second virtual plane) to achieve substantially the same result (successfully disposing an object for display at a particular angle based on the first plane angle of approximately 74 degrees). See *Adams Respiratory Therapeutics, Inc. v. Perrigo Co.*, 616 F.3d 1283 (Fed. Cir. 2010).

a third viewing angle of the third back support is 49 degrees.	<p><b>This element is met for each Accused Product at least under the doctrine of equivalents.</b></p> <p>In particular, there are no substantial differences between this claim element and the corresponding features of any Accused Product, as set forth herein.</p>
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The identified feature of the Accused Products performs at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.

In particular, an angle that approximates 49 degrees performs substantially the same function (providing a particular viewing angle) in substantially the same way (by maintaining a particular viewing angle a when an object is being displayed based on a first plane angle of approximately 49 degrees to a second virtual plane) to achieve substantially the same result (successfully disposing an object for display at a particular angle based on the first plane angle of approximately 49 degrees). See *Adams Respiratory Therapeutics, Inc. v. Perrigo Co.*, 616 F.3d 1283 (Fed. Cir. 2010).

## EXHIBIT D

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## U.S. Patent No. RE 48,479 – Ontel and the Retailer Defendants

### Claim 12

Happy Product, Inc. (“HPI”) provides evidence of infringement of claim 12 of U.S. Patent No. RE 48,479 (hereinafter “the ‘479 patent”) by Ontel’s Pillow Pad (“Ontel”). In support thereof, HPI provides the following claim charts.

“Accused Products” as used herein is defined in HPI’s Complaint, and includes, but is not limited to, all versions of Ontel’s Pillow Pad product containing three rounded ledges, as well as any other multi-angle soft tablet stands having three rounded ledges sold or offered by sale by each Ontel and/or Retailer Defendant. It is further understood, on information and belief, that Ontel is responsible, in material part, for the functionality and design of those products that it provides.

These claim charts demonstrate Ontel’s and each Retailer Defendant’s infringement, and provide notice of such infringement, by comparing each element of the asserted claims to corresponding components, aspects, and/or features of the Accused Products. These claim charts are not intended to constitute an expert report on infringement. These claim charts include information provided by way of example, and not by way of limitation.

The analysis set forth below is based only upon information from available resources regarding the Accused Products, as no Defendant has yet provided any further non-public information. An analysis of Ontel’s and/or each Retailer Defendant’s (or other third parties’) technical documentation and/or software source code may assist in fully identifying all infringing features and functionality. Accordingly, HPI reserves the right to supplement this infringement analysis once such information is made available to HPI. Furthermore, HPI reserves the right to revise this infringement analysis, as appropriate, upon issuance of a court order construing any terms recited in the asserted claims. HPI provides this evidence of infringement and related analysis without the benefit of claim construction or expert reports or discovery. HPI reserves the right to supplement, amend or otherwise modify this analysis and/or evidence based on any such claim construction or expert reports or discovery.

Unless otherwise noted, HPI contends that Ontel and each Retailer Defendant directly infringes the ‘79 patent in violation of 35 U.S.C. § 271(a) at least by selling and offering to sell at least the Accused Products. The following exemplary analysis demonstrates that infringement.

Unless otherwise noted, HPI further contends that the evidence below supports a finding of indirect infringement under 35 U.S.C. § 271(b) in conjunction with other evidence of liability under one or more of those subsections. As set forth in the Complaint, Ontel induces others to make, use, sell, import, or offer for sale in the United States, or has induced others to make, use, sell, import, or offer for sale in the past, without authority products, equipment, or services that infringe at least claim 1 of the ‘454 patent, including without limitation, the Accused Products.

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Unless otherwise noted, HPI believes and contends that each element of each claim asserted herein is literally met through each Ontel's and each Retailer Defendant's provision of the Accused Products. However, to the extent that any Defendant attempts to allege that any asserted claim element is not literally met, HPI believes and contends that such elements are met under the doctrine of equivalents. More specifically, in its investigation and analysis of the Accused Products, HPI did not identify any substantial differences between the elements of the patent claims and the corresponding features of the Accused Products, as set forth herein. In each instance, the identified feature of the Accused Products performs at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.

To the extent the chart of an asserted claim relies on evidence about certain specifically identified Accused Products, HPI asserts that, on information and belief, any similarly functioning instrumentalities also infringes the charted claim. HPI reserves the right to amend this infringement analysis based on other products made, used, sold, imported, or offered for sale by Ontel and/or each Retailer Defendant. HPI also reserves the right to amend this infringement analysis by citing other claims of the '479 patent, not listed in the claim chart, that are infringed by the Accused Products. HPI further reserves the right to amend this infringement analysis by adding subtracting, or otherwise modifying content in the "Accused Products" column of each chart.

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Claim 12	Accused Products
12. A media support apparatus comprising:	Each Accused Product is a media support apparatus:  

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A body having a first support back, a second support back, and a third support back disposed about a central axis

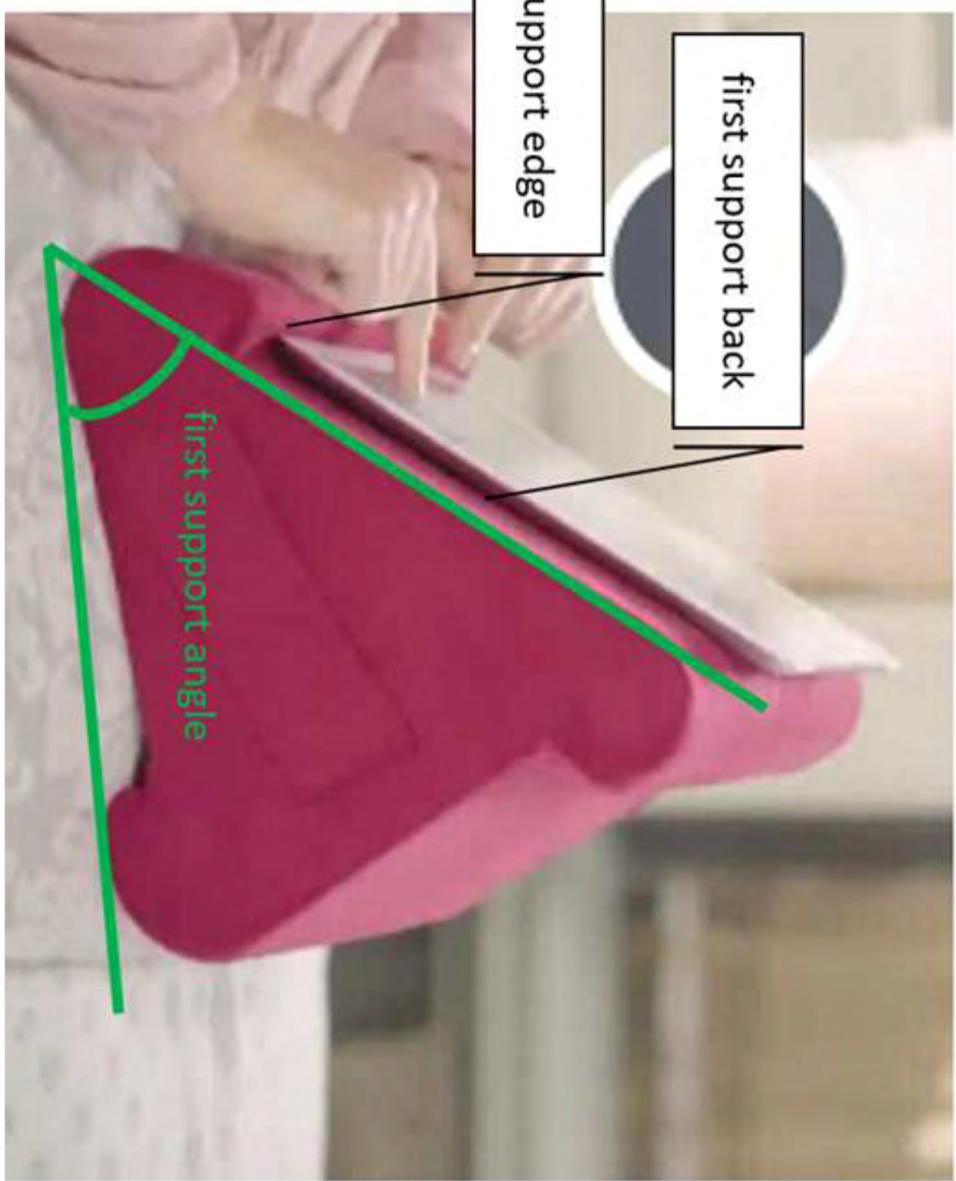
As shown below, each Accused Product includes a body having a first support back, a second support back, and a third support back disposed about a central axis.



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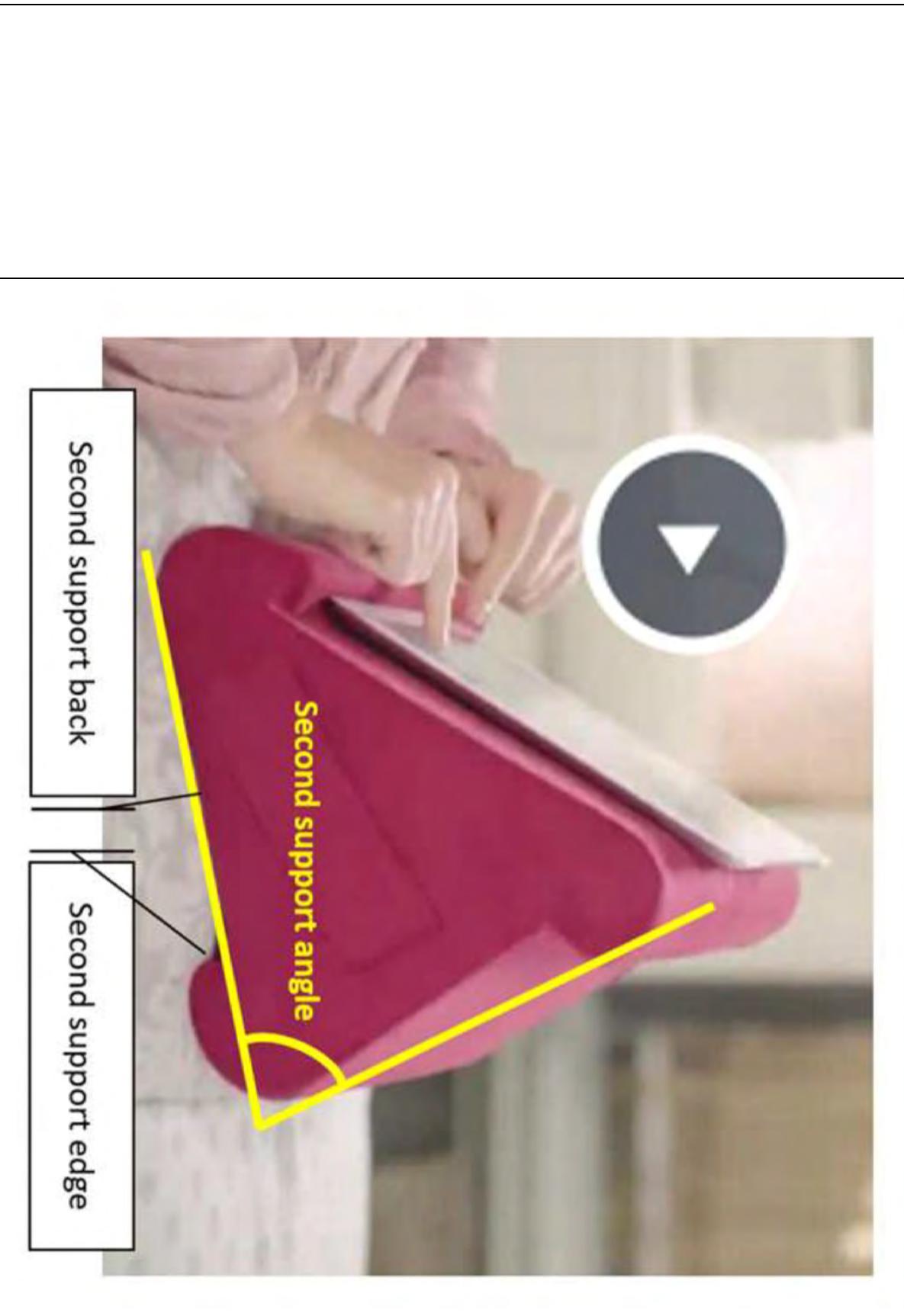
a first support edge disposed between the first support back and the second support back, the first support back and first support edge are configured to support a media device at a first support angle;

Each Accused Product has a first support edge disposed between the first support back and the second support back. The first support back and first support edge are configured to support a media device at a first support angle:

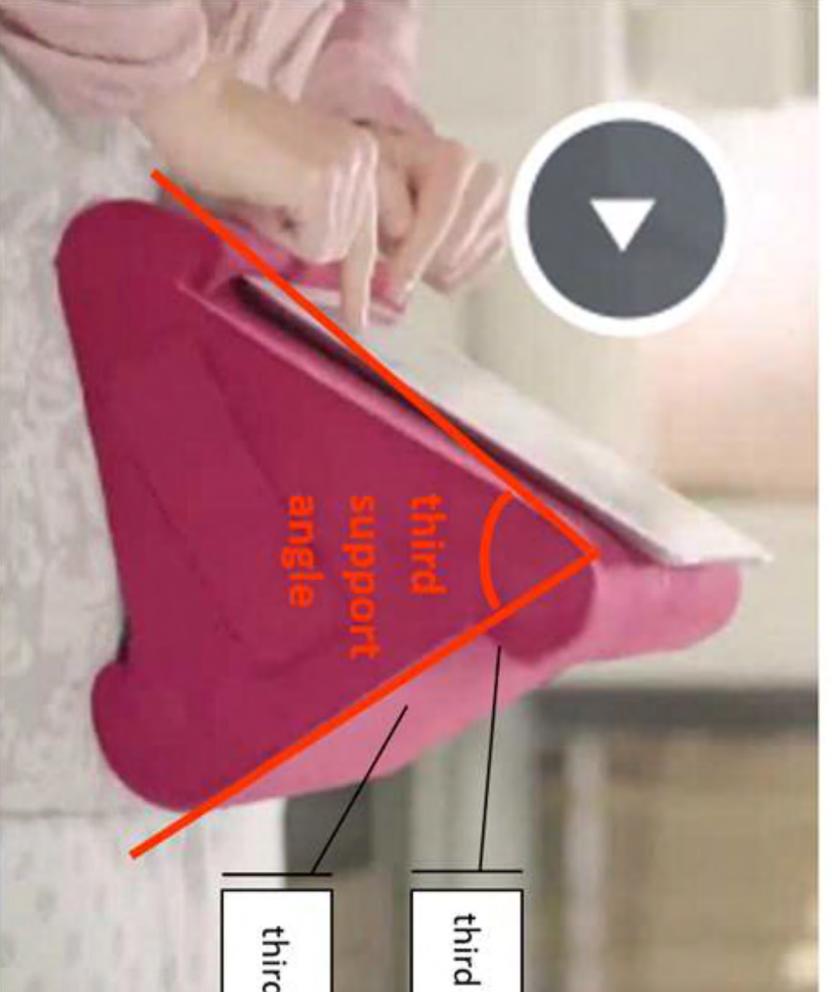


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a second support edge disposed between the second support back and third support back, the second support back, the second support back and second support edge are configured to support a media device at a second support angle;	Each Accused Product has a second support edge disposed between the second support back and third support back. The second support back and second support edge are configured to support a media device at a second support angle:
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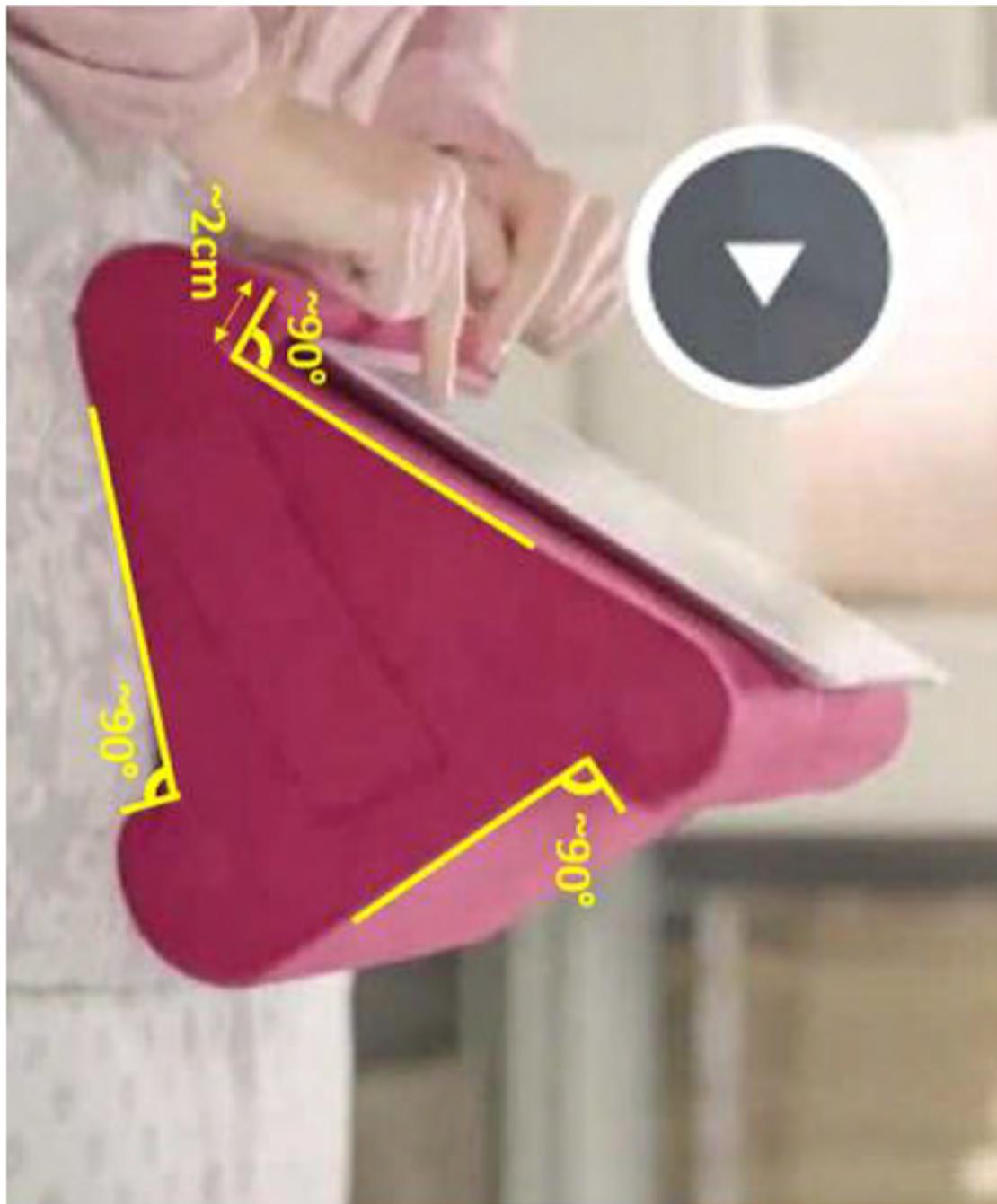
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	<p>a third support edge disposed between the third support back and first support back. The third support back and third support edge are configured to support a media device at a third support angle,</p> <p>Each Accused Product has a third support edge disposed between the third support back and first support back. The third support back and third support edge are configured to support a media device at a third support angle:</p> 
<p>wherein each edge support comprises an edge support width with an edge angle in the range of 85 to 120 degrees to an adjacent support back, a face of each edge support width oriented clockwise about the central axis;</p>	<p>The edge support of each Accused Product comprises an edge support width with an edge angle in the range of 85 to 120 degrees to an adjacent support back, a face of each edge support width oriented clockwise about the central axis;</p>

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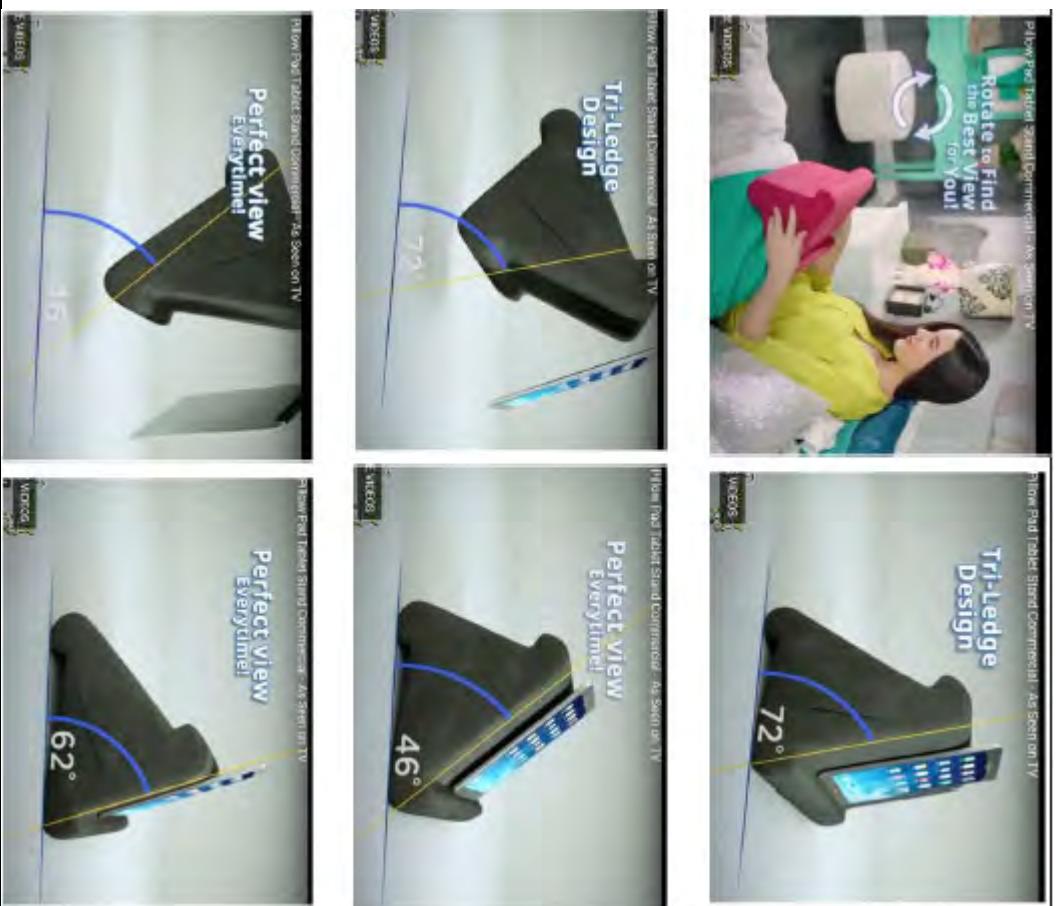
degrees to an adjacent support back, a face of each edge support width oriented clockwise about the central axis;



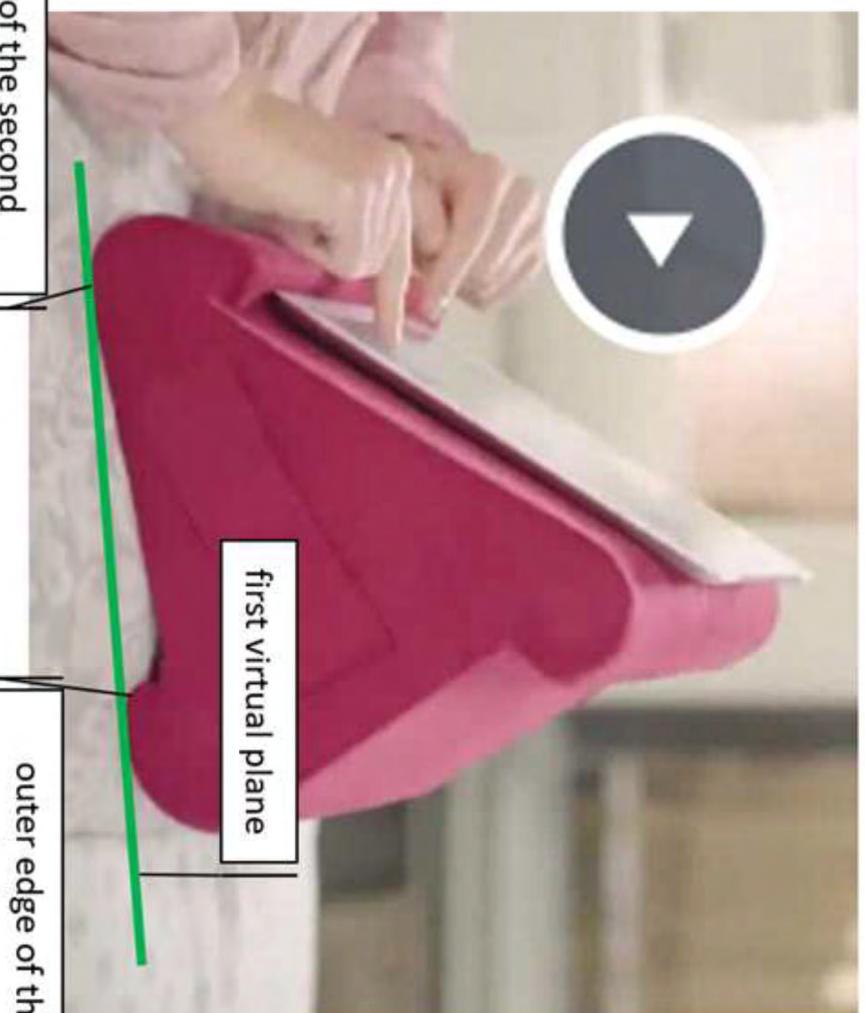
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wherein the media support apparatus is configured to be rotated about the central axis so that the body can rest on a horizontal support in any one of three positions including

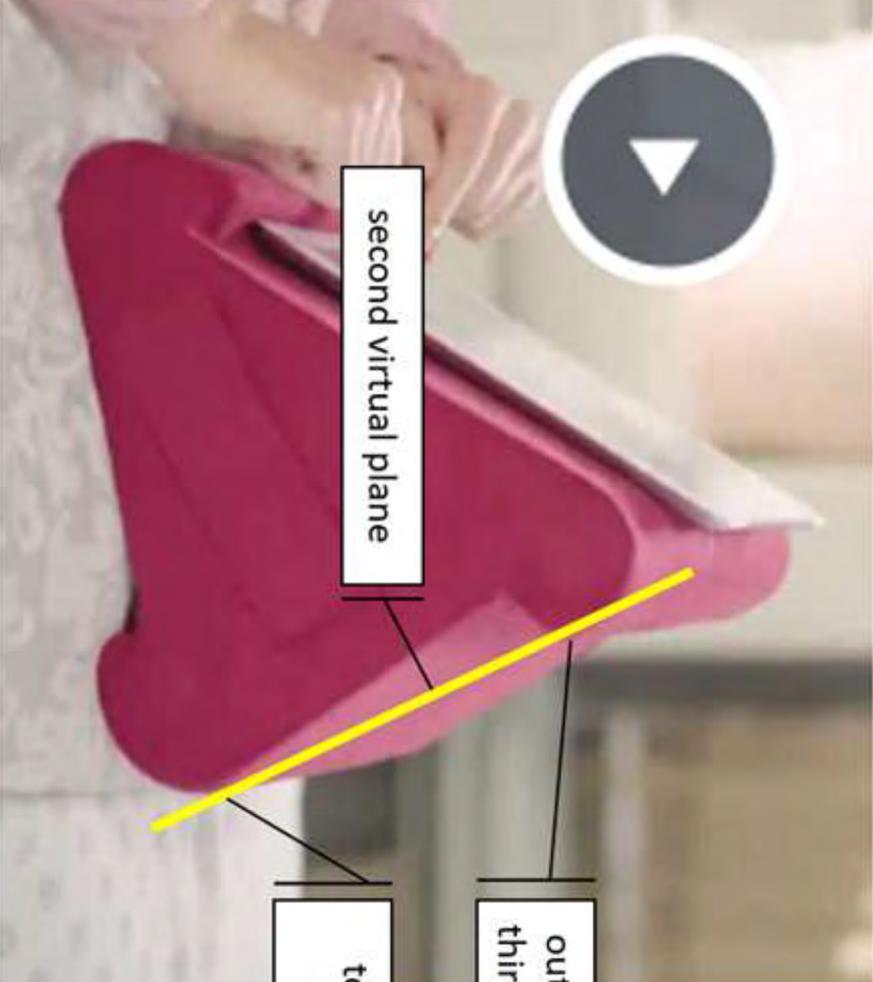
Each Accused Product is configured to be rotated about its central axis so that the body can rest on a horizontal support in any one of three positions:



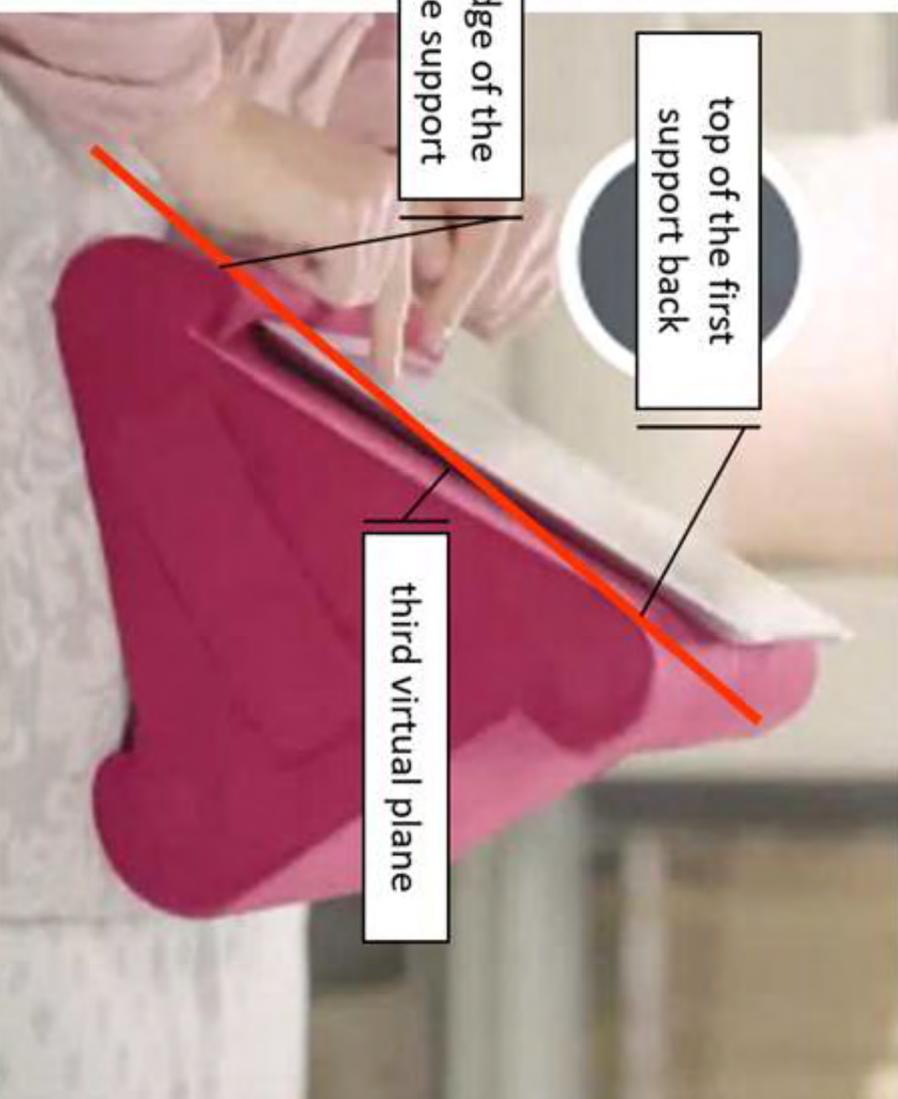
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<p>on a first virtual plane between a top of the second support back and an outer edge of the second edge support,</p>	<p>Each Accused Product is configured to be rotated about its central axis so that the body can rest on a horizontal support on a first virtual plane between a top of the second support back and an outer edge of the second edge support:</p>
 <p>top of the second support back</p> <p>first virtual plane</p> <p>outer edge of the second edge support</p> <p>on a second virtual plane between a top of the third support back</p> <p>Each Accused Product is configured to be rotated about its central axis so that the body can rest on a horizontal support on a second virtual plane between a top of the third support back and an outer edge of the third edge support:</p>	

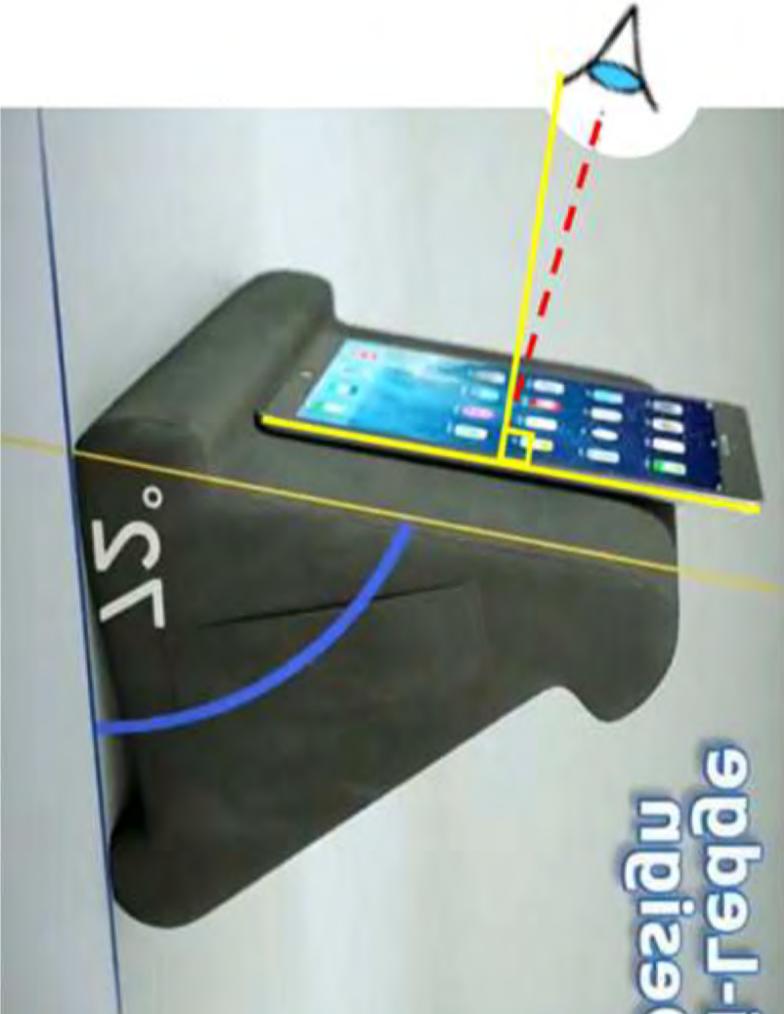
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<p>support back and an outer edge of the third edge support, and</p>	 <p>second virtual plane</p> <p>outer edge of the third edge support</p> <p>top of the third support back</p> <p>on a third virtual plane between a top of the first support back and an outer edge of the first edge support; and</p> <p>Each Accused Product is configured to be rotated about its central axis so that the body can rest on a horizontal support on a third virtual plane between a top of the first support back and an outer edge of the first edge support:</p>

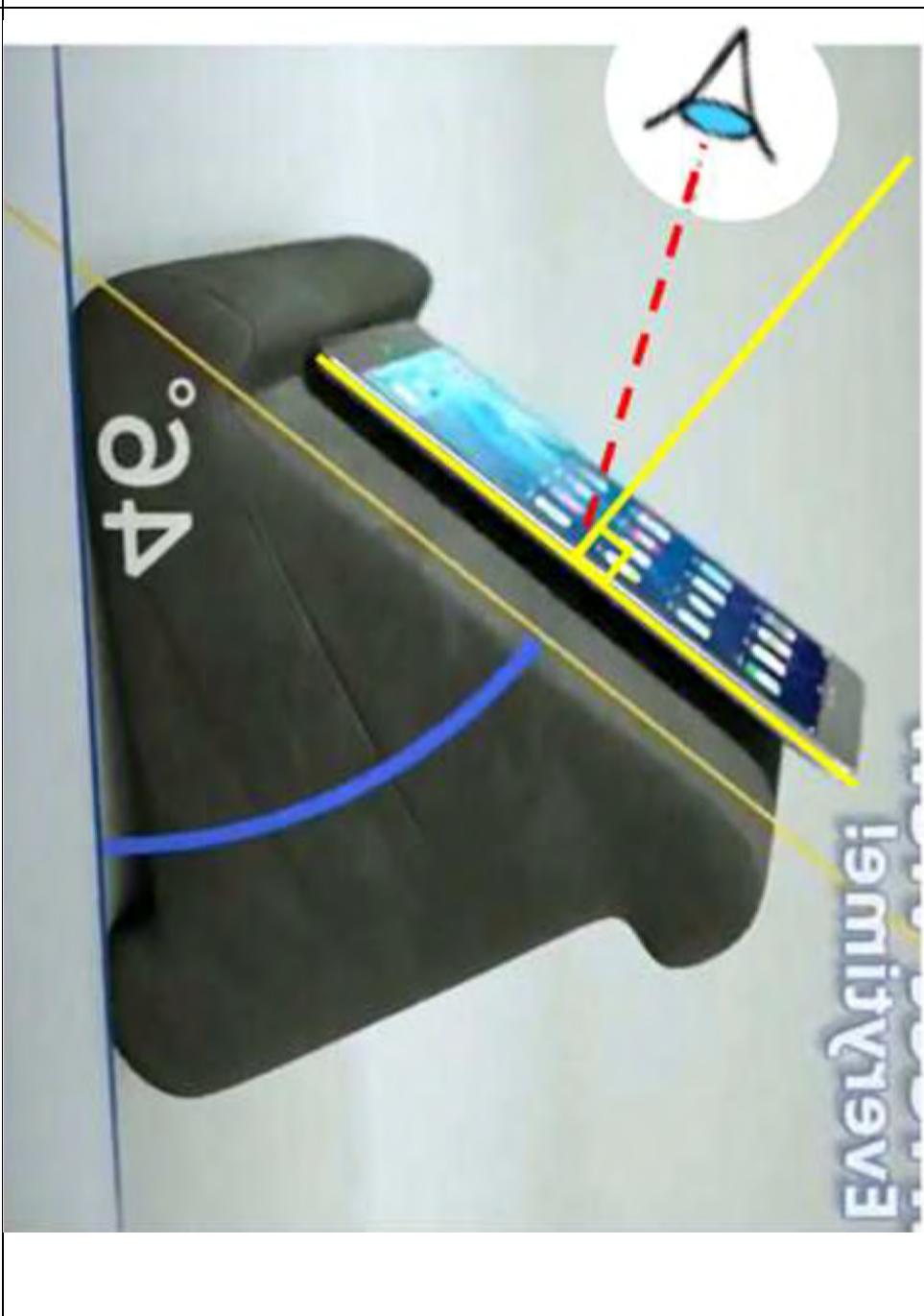
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	 <p>wherein the media support apparatus is configured to provide a first viewing angle of the media device when the media device when the media support apparatus body rests on a first viewing angle of the media device when the media device when the media support apparatus body rests on</p>
	<p>Each Accused Product is configured to provide a first viewing angle of the media device when the media support apparatus body rests on the first virtual plane and the media device is supported at the first support angle:</p>

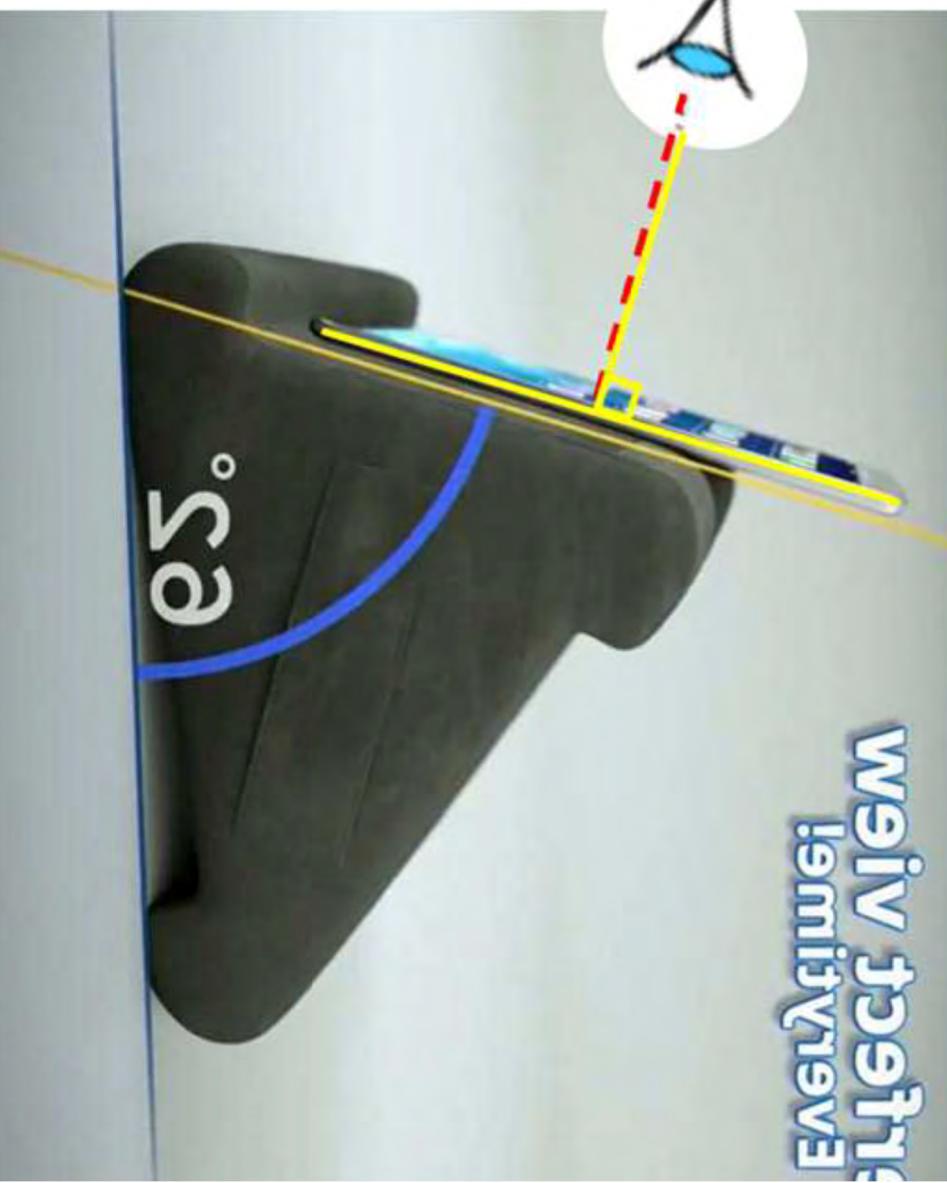
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	<p>the first virtual plane and the media device is supported at the first support angle,</p>
<p>a second viewing angle when the media support apparatus body rests on the second virtual plane and the media device is supported at the second support angle, and</p>	<p>Each Accused Product is configured to provide a second viewing angle when the media support apparatus body rests on the second virtual plane and the media device is supported at the second support angle:</p> 

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<p>a third viewing angle when the media support apparatus body rests on the third virtual plane and the media device is supported at the third support angle,</p>	
<p>Each Accused Product is configured to provide a third viewing angle when the media support apparatus body rests on the third virtual plane and the media device is supported at the third support angle:</p> 	

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wherein the first viewing angle, the second viewing angle, and the third viewing angle are different from one another.	<p>In each Accused Product, the first viewing angle, the second viewing angle, and the third viewing angle are different from one another, as shown above and below:</p>  A photograph of a dark-colored, contoured pillow pad. A blue curved arrow on the left side indicates a viewing angle of 62 degrees. A yellow dashed line and a red dashed line meet at a point on the top edge of the pillow pad, forming a right angle. A white circle with a black outline contains a blue letter 'A'. To the right of the pillow pad, the word "viewing" is written vertically in blue, and "angle" is written vertically in red, with a small exclamation mark at the end of "angle".

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